FINAL

ENVIRONMENTAL ASSESSMENT

FOR

JOINT TASK FORCE SIX OPERATIONS JT089-93, JT094-93 AND JT265-93

DOUGLAS, COCHISE COUNTY, ARIZONA

Prepared for:

Joint Task Force Six

Fort Bliss, Texas

Prepared by

United States Army Corps of Engineers

Los Angeles District

Los Angeles, California

February 1993

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

ENVIRONMENTAL ASSESSMENT
FOR
JOINT TASK FORCE SIX OPERATION - DOUGLAS, ARIZONA

COCHISE COUNTY, ARIZONA

I have reviewed the attached Environmental Assessment (EA) prepared by U.S. Army Corps of Engineers (COE), Los Angeles District (LAD) for the Joint Task Force Six (JTF-6) Project, Douglas, Cochise County, Arizona, JT 089-93, JT 094-93, and JT 265-93, Established by the Secretary of Defense on 13 November 1989, JTF-6 plans and coordinates Title 10 Department of Defense support to Federal, State, and local law enforcement agencies as requested by Operation Alliance and approved by the Joint Chiefs of Staff to disrupt illegal drug smuggling operations along the southwest land border and to protect national security.

The purpose of JTF-6 Operations in Douglas, Arizona is to provide routine maintenance to existing drag and mountain roads, along the U.S.-Mexico Border and to install fences at the U.S. Border Patrol Station in Douglas, Arizona. The Border Patrol does not have the equipment or personnel to adequately maintain the drag or mountain roads. The Border Patrol Station grounds are susceptible to theft and vandalism and have no canine holding or training areas.

1. Description of Proposed Actions:

The proposed project includes three components:

JT 265-93, the maintenance of 24 miles of an existing drag road east and west of Douglas, Arizona.

JT 094-93, the maintenance of about one mile of mountain road east of Douglas, Arizona.

JT 089-93, the installation of fences at the U. S. Border Patrol Station at Douglas, Arizona.

The road maintenance will consist of light scraping, installation of culverts, grading and shaping for drainage, placing gravel in a slowly flowing wash and resetting existing cattle guards. Road projects will be maintained within their existing width. Limited turnarounds and passing areas will be coordinated with on-site monitors. Project construction will take about sixty days, and is scheduled to be accomplished between February and April 1993. There may be deviation from the proposed construction schedule due to funding or availability of military construction troops; however, project construction will

be accomplished prior to March 1994. In the event of delay, resource agencies and concerned individuals will be notified via telephone by Corps personnel. In the event of flooding or heavy rain, project construction will be postponed until conditions are again suitable for the movement of equipment and materials.

2. Environmental Impact Analysis:

The analysis of potential environmental impacts is documented in the EA for the Joint Task Force Six, Road Maintenance and Fence Project at Douglas, Arizona. All environmental commitments in the EA will be followed.

Air Quality: The City of Douglas is in a non-attainment area that is prone to dusty and smoky conditions. During road maintenance activity, a watering program will be used to contain airborne dust particles. Motorized vehicles associated with construction activity will be in the area for a short duration and are not expected to produce a significant quantity of emissions to impact air quality. Air quality is not expected to be degraded by the proposed project.

Water Quality: Only one perennial stream is found in the project area. Gravel will be placed in this stream to aid traction. All culverts will be built on ephemeral streambeds. All maintenance will stop during heavy rains and will not resume until the washes are dry.

Land Use:

The land use at and surrounding the project site will not be altered by the project construction.

Vegetation: The majority of the activity will take place on existing roadbeds. On the mountain road, some plants may be relocated. Impacts to existing vegetation are anticipated to be minimal and will be limited to those areas that must be disturbed for road maintenance or improvement. Most of the impacts to vegetation will be at the road edges and of short duration. With the construction constraints listed in the EA, there will be no impact on the agave plants used as a food source by the lesser long-nosed bat. The area at the Border Patrol Station is disturbed; therefore, little impact from the fence installation is expected.

Wildlife: The proposed action will have little or no impact on fish, because construction will occur primarily in upland and dry washes. At one wash, with permanent water, gravel will be added to aid traction on the firm bottom. Other wildlife may experience minor, temporary disruption, but this is expected to

be very short-term and not significant.

Threatened and Endangered Species: The project is not expected to impact any Federally listed threatened or endangered species. With the construction constraints in this EA, the project will have no impact on the lesser long-nosed bat.

Cultural Resources: The project will not result in adverse impacts to the cultural resources of the project area.

Socioeconomic: The project will have a positive short-term economic effect on the local economy as a result of the construction crew's residence in the Douglas area for approximately 60 days. The long-term socioeconomic status of the area, however, will remain unchanged.

Hazardous and Toxic Materials: No hazardous or toxic materials were found on site visits, and construction constraints are included in the EA to remedy spills or accidents involving common construction materials.

Conclusion: A review of this Environmental Assessment and coordination with the appropriate agencies indicate that the actions, as proposed by the Joint Task Force Six Operation for road maintenance and fence installation, will not have significant impact on the quality of the physical or biological environment. All requirements of the National Environmental Policy Act (NEPA) have been satisfied; therefore, preparation of an Environmental Impact Statement (EIS) is not required.

3 Feb 1993
Date

John M. Pickler
JOHN M. PICKLER
Brigadier General, U.S. Army
Commander, Joint Task Force Six

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1.0 SUMMARY

1.1 Project Summary.

The Secretary of Defense established Joint Task Force Six (JTF-6) in November 1989 to coordinate all Department of Defense support to Federal, State, and local law enforcement agencies in their efforts to disrupt illegal operations along the southwest land border and protect national security. The JTF-6 has requested the U.S. Army Corps of Engineers, Los Angeles District to prepare an Environmental Assessment (EA) to assess impacts associated with providing routine maintenance to 24 miles of existing "drag" road and 1 mile of existing mountain road, and installing fences at the U.S. Border Patrol Station at Douglas, Arizona. The operation will be performed by military personnel, as part of their training. Construction will take about 60 days, and is scheduled from 5 February to 9 April, 1993. This schedule could be revised due to funding, availability of the military construction unit, or weather conditions; however, construction will be accomplished prior to March 1994. In the event of flooding or heavy rain, construction is postponed until washes are dry. If construction is delayed, resource agencies will be notified by telephone. The construction is planned to progress from east to west.

1.2 Location.

The project is located in Douglas, in the southeast corner of the State of Arizona in Cochise County; it is 117 miles southeast of Tucson along the U.S. and Mexico border (Figure 1). The project is located along the border approximately 13 miles both west and east of Douglas. The drag roads are located both west and east of Douglas, Arizona. The mountain road is located about 8 miles east of Douglas, Arizona. The fence component is located at the U.S. Border Patrol Station about one mile north of Douglas, Arizona. All proposed activity will be located within the U.S. boundary.

1.3 Summary of Impacts.

Short and long-term impacts associated with the proposed project are summarized as follows:

The maintenance of the existing drag and mountain roads and installation of Border Patrol Station fences would not have a significant effect on the existing environment. Short-term and long-term impacts are not anticipated to be significant.

Short-term Impacts.

o Fugitive dust particles and emissions generated by the equipment will increase within the project site during construction. During construction, water will be sprayed on roads using watering trucks to control fugitive dust.

o Standard construction practices will be utilized to minimize turbidity, if flow is present in washes during the construction period.

R o Disturbance will occur on about 50% of the mountain road, (50% of 10 feet x 1 mile) disturbing about 0.6 acre. Therefore, probable temporary vegetational impacts will be less than one acre. The vegetation along the drag and mountain road alignments is very sparse.

o The project will temporarily impact about 1/2 acre of land at the Border Patrol Station. This land was disturbed by the construction of the Station.

Long-term Impacts.

o The project will not increase traffic on the drag roads, only allow smoother progress and better tracking with the existing level of traffic. The increase of traffic on the mountain road is not expected to be significant.

o Maintenance of roads and fence installation will have no significant impact on cultural resources. Discovered archeological sites have been delineated in the plans and specifications and shall be avoided.

o About 1.2 acre of sparsely vegetated old road bed will be permanently disturbed. The environmental commitments in this document will limit this impact to the extent possible.

o Permanent vegetation disturbance will be limited to culvert installations, cattle guard refootings and drainage improvements along the drag roads and the mountain road. Project-related total disturbance of vegetation will be about 1.5 acres (about 1.2 acres from mountain road plus about 0.8 acres from cattle guards and culverts). The project has been designed to avoid and/or minimize adverse environmental impacts by imposing environmental constraints on construction activities. These constraints are listed in this EA.

2.0 PROPOSED ACTION.

2.1 Purpose and Need for Proposed Action.

The purpose of this JTF-6 Operation is to provide the U.S. Border Patrol with better access to border areas to spot and interdict drug trafficking and smuggling activities. The operation will also provide a more secure facility for contraband storage and canine holding and training.

The earlier Joint Task Force Counter Narcotics Operations (JTF-4 in the Gulf and JTF-5 in the Pacific) were so successful that there has been a significant increase in attempts to transport narcotics overland, across the U.S./Mexico border into the United States from Gulf-Coast Texas to Southern California.

JTF-6 has been tasked with addressing that increase in drug trafficking and in developing and implementing solutions that allow agencies charged with drug interdiction to accomplish their missions in a safe and efficient manner. The U.S. Army Corps of Engineers, Ft. Worth District, has initiated preparation of a Programmatic Environmental Impact Statement (PEIS) to address the types of JTF-6 projects being constructed along the southern border of the United States from Brownsville, Texas to San Diego, California. The Programmatic EIS will also include cumulative impacts of projects completed prior to preparation of the Programmatic EIS.

The purpose of the Douglas project is to provide Counter Narcotics Agents (CNAs) with improved access to border areas to spot and interdict drug trafficking and smuggling activities. This project will allow increased useful life of the drag and mountain roads, increased security and utility of the U.S. Border Patrol Station, increased safety and efficiency of response times for CNAs and reduced wear and tear on vehicles used for drug interdiction efforts. The U.S. Border Patrol does not have the personnel or equipment for routine road maintenance or fence building.

In addition to primary project purposes, the proposed action will function as a training mission for military personnel who will accomplish the construction. JTF-6 provides coordinated military support, responding to other agencies' requests for assistance if support is of military training value.

2.1.1 Need for Road Maintenance.

Maintenance of drag roads along the border is critical to successful interdiction of narcotics and apprehension of narcotics traffickers, and to the safety of U.S. Border Patrol and other Law Enforcement Agents. Assaults on Law Enforcement Officials have increased significantly as attempts to move narcotics across the border have increased; the proposed project is needed to help ensure officer safety and survival. The current condition of the roads along and near the border make travel slow and/or hazardous particularly in confrontation situations. The roads have eroded, heavily in some spots due to run-off along the road or across it. The routine travel of these roads in their present condition causes undue wear and tear on the vehicles and their operations as well as significantly reducing the area they can cover in a given period of time. In order to continue to provide essential drug smuggling information, the drag and mountain roads must be maintained. The U.S. Border Patrol does not have the personnel or equipment to maintain roads, therefore, they requested JTF-6 to provide this support.

The intent is to make the roads passable to law enforcement agency personnel. This will consist primarily of removing large

rocks and boulders, providing culverts, if needed, and doing some grading to reduce erosion potential or repair erosion damage. There is no intent to create major roadways. The roads are not intended for public use. The completion of this work will not only enhance the Border Patrol's ability to interdict drug traffickers but will cut their overall operating costs by reducing the maintenance cost on their vehicles.

2.1.2 Need for New Fence.

In its present state, the security at the U.S. Border Patrol Station at Douglas is not adequate. The addition of fences on the property will allow a dedicated confiscated vehicle storage area and canine holding and training areas. At the present time, when a vehicle or other large object is confiscated by the CNAs, it must be held at the Border Patrol Station wherever space can be found in the secure (walled and fenced area of the Station) area. With the addition of a chain link fence to limit access to a dedicated seized vehicle area, the processing of smugglers would be expedited and the safety and security of seized material could be ensured.

At the present time when the canine units are called to the Border Patrol Station at Douglas, the animals must be left in the agents' vehicles or brought in to the station. Each of these options is unacceptable for the animals, the Station and agents. The animals are very valuable and must be protected from the intense heat found in vehicles in the Douglas climate, so the animals are brought into the station with the agents. The animals, although very well behaved, would be best kept outdoors especially when the handler is required to remain in the Station for an extended period of time. Therefore, a small, shaded and fenced area outside the Station is planned. U.S. Border Patrol plans call for stepped-up canine training at the Douglas Station. This necessary activity requires a dedicated, fenced-in area for the establishment of a canine training area.

The overall security of the Station will be enhanced with the addition of two other security fences. A split-rail fence placed on the front edge of the property will act as a vehicle barrier on Lawrence Avenue, and a barbed-wire fence on the eastern boundary of the property will reduce the opportunities for vandalism and theft at the Station.

2.2 Project Description.

The proposed project includes three components:
JT265-93, maintenance of 24 miles of an existing drag road east and west of Douglas, Arizona,
JT094-93, maintenance of about one mile of mountain road east of Douglas, Arizona; and
JT089-93, installation of fences at the U. S. Border Patrol Station at Douglas, Arizona. (Figure 2).

2.2.1 Maintenance of Existing Drag Roads.

A fundamental element of any successful border interdiction program is the active use of "drag" roads. A drag road is a wide dirt road running parallel to the international border. Drag roads are used with sign-cutting and tracking procedures and techniques to provide a wealth of data on illegal activity along the international border. Information commonly gathered includes: border crossing points and times, type of entry, contraband type, access trails, pick-up points for drugs and traffickers' evasive activity.

The drag road maintenance will occur in two parts, east and west of Douglas, Arizona. The roads are used primarily by the CNAs and are not used as a road by the general public. The drag road maintenance will consist primarily of light scraping to remove the crown that was built into the road. Construction will also include placing culverts and grading slopes approaching washes to reduce erosion where the road crosses some ephemeral streams. Culverts will be placed along about seven smaller washes, the approach and exit of larger washes will be grading to improve access and repair erosion. Gravel will be placed in some ephemeral washes to help reduce erosion.

The portion of the road to the west of Douglas (the "west line") begins about one mile west of Douglas, Arizona, and continues west directly along the United States - Mexico Border, for approximately 12.5 miles. The majority of the work on the west line will be light grading. Gravel will be placed in White water wash to reduce muddying and increase traction, three existing cattle guards will be reset, a short section of the drag road will be raised to reduce erosion. Gravel will be placed in some ephemeral washes to help reduce erosion. Many small check dams (sand filled bags arranged to divert erosive water flows away from the road) occur on the west line. Vandalism damage will be repaired (replacing lost and scattered sandbags) on some existing small check dams. The repaired/replaced sandbags will then be covered with soil to reduce their attractiveness to vandals. No new check dam construction is planned.

The portion of the road to the east of Douglas (the "east line") has three segments and begins about two miles east of Douglas, Arizona at the "airport gate". The first segment goes east directly along the United States - Mexico Border for approximately 6.5 miles, where the mountain road begins. The four wheel-drive mountain road is about one mile in length and will connect the two sections of east line drag road. The drag road then continues along the boundary line for about 5 miles to its end.

The first segment of the east line will require mostly light grading. Four culverts are planned, along with drainage improvements to the roadbed, consisting mainly of filling a small

ditch on one side of the road and improving the ditch on the other side. The east line is divided into two parts, that west of the mountain road, and that east of it [2.2.2.].

The east line continues along the border after the mountain road for about 6 miles. This segment will require only light scraping. The maintenance work for all segments of the drag and mountain roads will be performed on existing roadbeds. Tree and vegetation removal will be minimized to the extent possible. The maintenance involves removing rocks, leveling/grading operations and installing a number of culverts to cross ephemeral streams. Wash crossings will be carefully planned to avoid, to the extent possible, impacts to established vegetation. Road projects will be maintained within their existing width. Limited turnaround and passing areas will be coordinated with on-site monitors. These turnaround and passing areas will be disturbed only during construction; they are anticipated to recover quickly.

The majority of the proposed project occurs on land administered by the U.S. Bureau of Land Management (BLM) through a 1907 Presidential Proclamation. This Proclamation set aside 60 feet of land along the United States - Mexico Border as " protection against smuggling of goods between the United States and Mexico". The drag roads which parallel the border, often within 10 feet of the fence, vary in width from about 10 feet to more than 30 feet. The mountain road is about 10 feet wide for all of its about 1 mile length. A short segment of the mountain road leaves the BLM 1907 Proclamation easement and crosses BLM and State Land. BLM and State Lands Department have been coordinated with regarding the proposed project and right-of-way agreements.

The operation will be performed by military personnel. About 110 military personnel will reside at the military bivouac site north of the Douglas rifle range, which is located on the eastern edge of the City of Douglas, [2.2.5]. The operation will be part of their training exercise. They will bring their own equipment. Any material for drainage improvements will be obtained from local sources.

2.2.2 Maintenance of the Existing Mountain Road.

The mountain road is not a drag road and will not be maintained as one. It is an old, four wheel-drive mining road and needs maintenance to counter erosion and allow for safe and efficient passage of vehicles. It is in this segment where the road leaves, for about 1/2 mile, the 60-foot easement along the border. The road crosses about 100 yards of BLM land not covered in the 1907 Presidential Proclamation and then crosses about 200 yards of State Land Department jurisdiction before returning to the BLM 1907 easement. The road will be maintained to an existing width of approximately 10 feet. With the mountain road in its present state, agents must negotiate its unmaintained

slopes and washes at very slow speeds in order to avoid severe damage to their vehicles. They more often choose to avoid this section of road and must drive about one mile north, on an unmaintained four wheel-drive road, access the county road, drive about two miles east, and drive about one mile south on another four wheel-drive road, they then can access the boundary drag road again. This interrupts the agents' ability to monitor the area and increases response times and wear and tear on vehicles. The maintenance of this mountain road will consist primarily of grading of the road surface to provide adequate drainage and reduce erosion and, in places, sloping the entrances and exits to washes to allow smoother access. The maintenance work for the mountain road will be performed on existing roadbeds. Tree and vegetation removal will be minimized to the extent possible. The maintenance involves removing rocks, leveling/grading operations, and repairing erosion damage to the roadbed. No culverts are planned. No perennial streams exist in the mountain road area. All wash crossings will be carefully planned to avoid, to the extent possible, impacts to established vegetation. Road projects will be maintained within their existing width. Limited turnarounds and passing areas will be coordinated with on-site monitors, and will be disturbed only during construction. They are anticipated to recover quickly.

2.2.3. Installation of Fences at Border Patrol Station.

The third part of the proposed project is the installation of three types of fence, split-rail, barbed wire and chain-link, on the property of the U.S. Border Patrol Station at Douglas, Arizona (Figure 3). The split-rail fence will be about 200 feet long and placed along the northern boundary of the Station, along Lawrence Avenue, to act as a vehicle barrier for the front of the Station. The 700 feet of barbed wire fence will be located along the east and south boundaries of the Station (Figure 4). It will provide secure storage for confiscated material. The 900 feet of chain-link fence will delineate a dedicated canine holding and training area and a confiscated vehicle storage area.

2.2.4 Staging Areas.

A staging area is an overnight storage area for four or five pieces of construction equipment. Many such areas are available along the drag roads (Figure 2). On the west line, the identified areas are at the east end of the line at a wide spot in the road west of Whitewater Draw, 5.1 miles west of Whitewater Draw, on the north side of the drag road, and at the junction of the drag road and the pipeline road (not over the pipeline, however) near the western end of the west line (Figure 2). They are located at the "airport gate", the west end of the east line, about 5 miles west of the east end of the east line where the drag road begins and the mountain road ends, and at the east end of the east line at a wide spot in the road. The staging areas will be used to hold equipment over night, and will be under guard to prevent vandalism. The areas were selected because the

vegetation at the sites shows evidence of disturbance. Using these areas as staging areas will reduce the vegetational impacts of the project. Standard construction practices will be used to limit impact of the staging on the sites.

2.2.5 Bivouac Area.

The approximately 5-acre bivouac area is located on the north side of the Douglas Rifle and Pistol Range (Figure 2). The area is part of an old military land parcel used for firearm training since World War I. It is heavily disturbed, having been scraped in the last few years. The approximately 110 military personnel housed in the bivouac area will be self-sufficient, with sleeping quarters, a kitchen, generators, lights and medical support. The troops are scheduled to begin work the first week of February 1993 and finish the first week of April 1993. The bivouac area will be in use slightly before and after these dates to allow for set-up and tear-down. There may be deviation from the proposed construction schedule due to funding or availability of construction troops. However, project construction will be accomplished prior to March 1994. In the event of delay, resource agencies and concerned individuals will be notified by telephone.

R 2.2.6 Borrow Area and Waste Disposal.

Almost all of the material needed for the project will come from the project roadbed itself. For the areas where gravel will be placed in wash bottoms, and if additional material is needed on the roadbed, the vendor contracting office of Fort Huachuca will be contacted to provide material. Chemstar Lime Company of Douglas, Arizona also sells fill material. Gravel smaller than 3/8 inch could also be used to stabilize the dirt road's surface. All material used on roads and in washes will have organic material removed to increase its stability. All excess material will be used on site. Any oil or grease from equipment use will be immediately cleaned up by military personnel.

3.0 ALTERNATIVES.

3.1 No Action Alternative.

A "no action alternative", meaning no maintenance of the existing drag and mountain roads and no fences at the Border Patrol Station, would result in continued increase in drug smuggling-related activities. The U.S. Border Patrol would soon lose access to border areas to spot and interdict drug trafficking and smuggling activities due to impassable road conditions. The cost of doing business would increase as vehicle damage would increase and interdiction activities would slow down. The current situation of confiscated material being subject to vandalism and theft would continue. Without a dedicated canine holding and training area the canine program at Douglas would not be able to expand to meet the increased demands placed on it by the illegal narcotics traffic in the area.

3.2 Proposed Action/Plan.

The preferred alternative is to maintain the existing drag and mountain roads and install fences at the Border Patrol Station at Douglas, Arizona.

The current roads are in need of maintenance to prevent them from becoming impassable. The amount of maintenance varies from very light scraping to installing culverts and improving ditches. There is currently no fence around the Border Patrol Station at Douglas. The addition of fences at the site will provide a dedicated canine training area, a dedicated canine holding area, a secure dedicated seized-property area and a theft and vandalism resistant Station.

3.3 Other Alternatives.

No other road alignments or maintenance alternatives were considered. It would be more environmentally damaging and more costly to construct all new roads than to maintain those already in use. No alternatives were considered for the mountain road, as only the proposed maintenance plan could result in balancing of environmental and cost benefits with continued utility. Maintaining the drag roads and not maintaining the mountain road would prolong the life of the drag roads, but the access to the east line would still cause vehicle damage and be slow, tedious travel. This alternative would not eliminate the "no-man's land" where CNAs are no closer than 1/2 mile to the border, with no vehicular access to the border, as would the preferred alternative.

4.0 AFFECTED ENVIRONMENT.

4.1 Land Use and Related Characteristics.

4.1.1 Physical Setting.

The proposed project will involve drag and mountain roads located on both sides of Douglas, Cochise County, Arizona at an elevation of approximately 4,000 feet. The topography of the area is typical of the South-Central Arizona Mexican Highland Type. It is characterized by a series of low, rugged mountain ranges, with several peaks rising to approximately 4,500 feet, separated by canyons and valleys. The mountain ranges are composed primarily of limestone, sandstone, shale, quartzite and granite; numerous quartz dikes cut across all other rock types. Other rock types include granite, cobbles and boulders in matrix of red sandy clay or clayey sand; these deposits are very well compacted and are partially cemented by caliche. Graded deposits of quartzite, quartz monzonite, sandstone and agate occur in wash channels and form a small percentage of the entire deposits. Erosion potential is, therefore, considered low to moderate.

The climate of the project area is characterized as semi-arid high desert. The average mean temperature varies between 44 and 79 degrees Fahrenheit (dF), with a high of 94 dF in June/July to a low of 29 dF in December/January. Winds are generally

moderate, with light breezes (10 knots) prevailing from the east/west. Average precipitation ranges between 13 and 16 inches per year, with the greatest chance of rain in the "monsoon season" of July through August. This rain is likely to be the result of convective/thunderstorm activity and is often of short duration, but with very heavy downpours possible.

4.1.2 Land Use.

The proposed project site is in a remote area and is predominantly open space and agricultural (cattle grazing) upland. The proposed project area is accessed almost exclusively by CNAs and land owners. Currently, CNAs use the roads about once a day. This use would increase with the planned project.

The east end of the west line is located near the slag heaps from the copper smelting industry in the region. This slag was once used by local railroads as a bed material for rail-lines.

4.1.3 Socio-Economics.

The City of Douglas is located on the United States - Mexico International Border. Originally, Douglas was the site of annual round-ups for surrounding ranches. The City was founded in 1901 to serve as a site for copper smelting and was incorporated in 1905. Agriculture and ranching are still important segments of the area's economy. In addition, Douglas in now a center for commerce, manufacturing, mining, agriculture and tourism. International commerce is also an important facet of the Douglas economy (Arizona Department of Commerce, 1990).

4.2 Environmental and Related Resources.

4.2.1 Surface Water Resources.

There is only one perennial stream in the project area, Whitewater Draw, on the east end of the west line. It is located in the SE 1/4 of Sec. 15, T. 24 S., R. 27 E. On two site visits, (4 November and 30 November 1992) the wash had a slight flow with a section of 6" deep water where the drag road crosses the wash. All other washes are ephemeral and were observed to be dry on three site visits. Cattails were found to be the dominant vegetation.

4.2.2 Biological Resources.

4.2.2.1 Vegetation.

Vegetation in the project area is predominantly semidesert grassland and Chihuahuan desert scrub. Field investigations of the drag road maintenance and improvement project were conducted on November 4, 5, and 30, 1992 to inventory and evaluate the effects of the project on biological resources. The area is dominated primarily by low shrubs and grasses. Dominant and common shrubs include white-thorn acacia, creosote bush, snakeweed, desert broom, tarbush, yucca, and sotol. Mesquite is scattered throughout the project area and becomes common along the lower lying drainages. Ocotillo, prickly pear, and cholla

are locally common, especially in the vicinity of the mountain road. Common grasses include sacaton, grama grasses, sprangletop, Lehmann's lovegrass, and Johnson grass. Semidesert Grasslands of the southwest are described in detail in Brown (1982), Humphrey (1958), and Martin (1975). Plant species identified in the vicinity of the project are listed in Table # 1.

4.2.2.2 Fish and Wildlife.

A diversity of wildlife occurs in the project vicinity, associated with the habitats provided by the various herbaceous and woody plants. The only permanent water in the project area is at Whitewater Draw. This site does not appear to be significant fish habitat.

Mammals identified during the field survey were recognized primarily from sign (tracks, scat, and burrows) rather than actual observation of individuals. One mule deer and one cottontail rabbit were observed. Sign of these species, as well as coyote, jackrabbit, woodrat, pocket gopher, coatimundi, and javelina were seen in the field. Numerous other mammals, including Coue's white-tailed deer, and a diversity of smaller mammals inhabit the project area. Mountain lions and bears are found in the nearby mountains and occasionally visit the project area. Wolves were seen in the area in 1987 (Hudson, personal communication). Table 2 provides a more extensive list of mammal species (including scientific names) potentially found in the project area.

One juvenile snake, probably a gopher snake(Pituophis melanoleucus), and one unidentified juvenile lizard, possibly a desert grassland whiptail (Cnemidophorus uniparens), were observed during the field investigations. Other reptile and amphibian species expected to be found at the site include: Couch's spadefoot toad (Scaphiopus couchii), western green toad (Bufo debilis insidior), desert box turtle (Terrapene ornata luteola), southwestern earless lizard (Holbrookia texana scitula), Mexican hognose snake (Heterodon nasicus bennerlyi), western hooknose snake (Ficimia cana), common king snake (Lampropeltis getulus), and western diamondback rattlesnake Crotalus atrox).

Bird species identified during the survey include: northern harrier, redtail hawk, gambel's quail, roadrunner, mourning dove, and white-crowned sparrow. Additional common species would include other species of hawks, kestrel, turkey vulture, owls, kingbirds, swallows, wrens, warblers, grosbeak, and other species of sparrows. Golden eagles are known to occur in the project area, but are uncommon.

4.2.3 Endangered and Threatened Species.

The U.S. Fish and Wildlife Service, January 6, 1993

Endangered Species Information letter stated that two Federally-listed species may potentially occur in the project area. These are the endangered lesser (Sanborn's) long-nosed bat (Leptonycteris curasoae yerbabuenae) and the Threatened Cochise pincushion cactus (Coryphantha robbinsorum).

The Cochise pincushion cactus is a newly-described (in 1976) species. It is a small unbranched cactus which has been found only in Cochise Co., Arizona, and nearby Sonora, Mexico. The plant is a narrow endemic and occurs only in the Semidesert Grassland with small grama grasses, other succulents and small shrubs on gray limestone hills at an elevation of 4200 ft (USFWS 1986; Rutman, 1992). All known populations in Arizona (which are unpublished to protect the plants from collectors) are on privately owned ranches and Arizona State lands. The probability that undocumented localities of this species exist is small (Rutman 1992).

The lesser long-nosed bat is a member of the leaf nose bat family, Phyllostomidae, and the subfamily of nectar-feeding New World bats, Glossophaginae. The population in the southwest U.S. and northern Mexico are migrants in the northern part of their range and are present from late May through early September, roosting in caves, mines, and abandoned tunnels. In the fall (October and November) the bats migrate south to feed on later blooming agaves and in winter feed on flowering trees of central and southern Mexico. The bats migrate north to southern Arizona and southwestern New Mexico in early spring. While in the northern portion of their range, the bats feed on the nectar and pollen of flowers of paniculate agave, especially Agave deserti, A. parryi, and A. palmeri, and early blooming columnar cacti such as the giant saguaro and organ pipe. In the proposed project vicinity, Agave palmeri is the potential food source for the endangered bat; however, very few of these agaves are found immediately adjacent to the Douglas drag road.

Lesser long-nosed bats feed in flocks which allow them to more efficiently exploit colonies of patchy, dispersed agave (Howell 1976). Bats work a plant (a given A. palmeri plant has 12-20 elliptical panicles with 60 flowers each) until the food intake in that plant (or clump of plants) falls below the average of the habitat. That is, bats feed on a plant until they have a greater probability of encountering flowers so low in nectar that it would be energetically inefficient to further work the plant. Howell and Hartl (1980) showed that these nectar feeding bats will move to another plant (or clump of plants) if the new plant has nectar, if the distance to that plant is predictable, and if the cost of flying to that plant is less than the cost of further working the current plant; in other words, bats forage optimally.

Since paniculate agave are an important food source of the endangered lesser long-nosed bat, a brief discussion of agave

life history and the agave-bat symbiotic relationship is provided.

Agave are long-lived leaf succulents that are native to the southwest U.S., Mexico and Central America. The plant consists of a thick, short stem surrounded with spirally overlapping leaves in a basal rosette. The leaves are generally armed with spines and teeth to protect the stem.

One of the unique features of agave is the single, tall (10-20 foot) flower stalk the plant produces in the last season of life. After this impressive flower stalk is produced, the plant rapidly goes into senescence, dies and topples. These plants were believed to take a century to flower (hence the common name "century plants") but rather live for 10-25 years (Gentry 1982; Nobel 1988).

The plant can reproduce asexually via rhizomatous suckers but more importantly via seeds. The lesser long-nosed bat is considered an important pollinator of the paniculate A. palmeri, (the species of agave found in the project area), so important that Howell and Roth (1981) consider the decline of agave and bats mutually linked. Cockrum and Petryszyn (1991), however, argue the point that the absence of bats do not prevent the plants from reproducing in regions outside of the bats' range.

It appears that these bats and plants have co-evolved to form a symbiotic relationship whereby the plant and bat developed physically and morphologically to receive mutual benefits from the plant-pollinator relationship. To facilitate pollination by bats, paniculate agave produce showy, easily accessible, musty, night-blooming flowers which have high-caloric nectar (which is produced only at night) and high-protein pollen. Bats have developed corresponding morphological adaptations (especially in tongue length and structure and dentition) which are adapted to feeding on these paniculate agaves (Howell 1976; Howell and Hodgkin 1976; Schaffer and Schaffer 1977; Howell and Roth 1981; Gentry 1982).

There is little published literature suggesting what constitutes good or poor lesser long-nosed bat foraging habitat. Derdeyn (1989) recommended that areas with densities of less than 110 flower stalks/sq. km. not be considered feeding habitat for lesser long-nosed bats. However, USFWS has not adopted any guidelines as to what does or does not constitute foraging habitat. Agave density in the project area is fairly low, with plants generally occurring as scattered individuals or small colonies. In the vicinity of the mountain road segment of the project area, the agave density may approach 110 flower stalks/sq. km.

R 4.2.4 Candidate Species; Special Status Species.

The Species Information letter also listed 2 Candidate Category 1 species and 14 Category 2 species as potentially occurring on site. Candidate Species are identified for planning considerations, but they are not protected under the Endangered Species Act, Section 7 (a). Category 1 (C-1) Candidates are those for which FWS has substantial information to support a proposal to list the species as Endangered or Threatened. Category 2 (C-2) Candidates are those for which additional information is needed to support a listing proposal. C-1 species that potentially occur on site are the southwestern willow flycatcher (Empidonax trailii extimus) and cactus ferruginous pygmy owl (Glaucidium brasilianum cactorum). The following C-2 species potentially occur in the project area: Mammals - California leaf-nosed bat (Macrotus californicus), Mexican long-tongued bat (Choeronycteris mexicana) (summer range), southwestern cave bat (Myotis velifer brevis) (winter range); Reptiles - canyon spotted whiptail lizard (Cnemidophorus burti), Texas horned lizard (Phrynosoma cornutum), Mexican garter snake (Thamnophis eques); Amphibians - lowland leopard frog (Rana yavapaiensis); Chiricahua leopard frog (Rana chiricahuensis); Plants - playa spider flower (Cleome multicaulis), needle-spined pineapple cactus (Echinomastis erectocentrus var. erectocentrus), Huachuca golden aster (Heterotheca rutteri), limestone Arizona rosewood (Vauquelinia california pauciflora), cynanchum (Cynanchum wigginsii), and unbarbed fetid-marigold (Pectis imberbis).

No candidate or other special status species were found during the field investigations, but the habitat appears suitable for many of these species. Neither of the C-1 species are expected in the immediate project area due to lack of suitable habitat. The willow flycatcher requires riparian habitat, and the cactus ferruginous pygmy owl is found in either riparian habitat or stands of large cacti, neither of which occur on site. The Mexican garter snake, Chiricahua leopard frog, and lowland leopard frog, are found only in areas with permanent water. In the project area, Whitewater Draw supplies a permanent water source, potentially providing habitat for small populations of these candidate species. Any of the bats potentially feed in the area. The California leaf-nosed bat and southwestern cave myotis potentially forage for insects throughout the project area. The Mexican long-tongued bat has similar feeding habits to the lesser long-nosed bat. The canyon spotted whiptail and Texas horned lizard potentially occur throughout much of the project area. The playa spider flower is found in alkaline sinks, old saline lake beds, and volcanic ash soil (Rutman, 1992). No suitable habitat for this species was found in the project area. The needle-spined pineapple cactus is a single-stemmed cactus 3-15 inches in height and 3-5 inches in diameter. This species is known from the Douglas vicinity and potentially occurs in the project area (Rutman, 1992; Benson, 1969); however, no single-

stemmed cacti were found during the field investigations. The Huachuca golden aster potentially occurs in the project area but it was not identified during field investigation. A late summer and fall-flowering perennial herb, this species could have been flowering during the early November field investigations. The limestone Arizona rosewood is known east of the project area. This plant, a large, conspicuous shrub, was not observed during the November 1992 field investigations. Due to the size and distinctive appearance of this shrub, it probably would have been seen if it occurred in the project area. Cynanchum, a slender vine in the milkweed family, is known only from elevations of 3,000 feet or lower (Rutman, 1992), and probably does not occur in the project area, where elevations are mostly 4,000 feet and higher. The unbarbed fetid-marigold is known from the Huachuca Mountains west of the project area (Rutman, 1992), but the habitat in the project area appears potentially suitable for this species.

The Arizona Game and Fish Department provided a letter dated December 22, 1992 stating that no state special status species are expected in the Douglas project area.

4.2.5 Air Quality.

The proposed project is located in a semi-arid region and is predominantly open space uplands. Air quality is primarily determined by meteorological conditions, and the composition and concentration of pollutants in the air. Prevailing meteorological conditions are not conducive to the concentration of pollutant emissions. Daily winds tend to disperse adverse air emissions. Typical pollutant sources, such as heavy industry and fossil fuel power plants, are absent from the area. The primary pollutant agent for the area is fugitive dust particles generated by wood burning, shrub and grass fires, unpaved roads and wind erosion. This is reflected in the fact that the area is in a PM-10 non-compliance area. Air quality in the immediate area is very good.

4.2.6 Noise.

The proposed project setting is characteristic of a natural environment, consisting predominantly of open space, rugged terrain and undeveloped uplands. Noise in the area is generated by CNAs and their surveillance operations, occasional aircraft overflights and smuggling related activities. The ambient noise level is negligible.

4.2.7 Cultural Resources.

The area of potential effects APE was surveyed by Geo-Marine in 1991 as part of the original JTF-6 road improvement project. As a result of that survey, several prehistoric and historic sites were found. Some of these sites were within the APE for that project. These sites are within the APE for the current project as the footprint is the same. In addition to the survey

by Geo-Marine, a field visit was made by the Corps staff in November and December 1992. The 1-1/2 mile segment of new road improvement was subject to a reconnaissance survey. The terrain in this areas is mostly quite steep, and is considered very low for the potential of intact resources. No sites were found.

4.2.8 Hazardous and Toxic Material.

No identified toxic material has been identified as occurring on the proposed project site; this is based on brief walkovers of the site.

5.0 ENVIRONMENTAL CONSEQUENCES.

5.1 Land Use and Related Characteristics.

5.1.1 Physical Setting.

No Action: This alternative will not impact the physical setting nor the local or regional climate characteristics of the area.

Proposed Action: The proposed project will not impact the physical setting nor the local or regional climate characteristics of the area. Within the immediate area of the roads, the physical setting will be changed due to removal of vegetation, placing gravel in washes, (all but one are ephemeral) grading for drainage improvement, installing culverts, repairing vandalism damage to existing check dams and refooting cattle guards. The Border Patrol Station will have fence around its perimeter, acting as a physical and psychological deterrent for vandalism and theft.

5.1.2 Land Use.

No Action: This alternative will not affect the local or regional land use.

Proposed Action: The planned road maintenance will alter the land an insignificant amount. Cutting, filling and light scraping will result in a slight increase potential for soil erosion on a very small scale. The project will have a permanent disturbance of about 2 acres (1.2 acres on mountain road and about .8 at culverts and cattle guards refootings). Road edges, up to 5 feet on each side if necessary, may be temporarily disturbed by the maintenance operation. Vegetation and erosion impacts will be reduced by installing culverts, repairing existing check dams and grading the roadbeds to repair past erosion. Standard erosion control construction techniques will be used on the site. The land use at the Border Patrol Station will change from unused to vehicle storage and canine holding/training.

5.1.3 Socio-Economics.

No Action: This alternative will not affect the local or regional socio-economics.

Proposed Action: The proposed project will have a short-term

beneficial impact on the local economy. About 110 military personnel are expected to reside in the military bivouac north of the Douglas Rifle Range for about 60 days. There will be an increase in revenues for commercial establishments, sales and trade centers.

5.2 Environmental and Related Resources.
5.2.1 Surface Water Resources.
No Action: This alternative will not significantly impact water quality.

Proposed Action: All washes in the project area, except Whitewater Draw, are ephemeral, with flows generally occurring for a few days in the "monsoon" season, (July and August) as a result of thunderstorm activity. Whitewater Draw is perennial. The only activity planned at Whitewater Draw is to place gravel in the slightly flowing stream bed to aid in traction on the firm stream bottom.

The top layer of soil in the area is very loose. The proposed activities are not expected to significantly increase soil erosion or adversely impact surface-water quality.

The placement of culverts in washes may increase initial turbidity, but will stabilize after vegetation reestablishes. With culvert placement, overall conditions will be improved. Erosion normally caused by vehicles crossing the washes will be reduced where the structures are placed. As it is standard operating procedure not to attempt construction during or immediately following periods of heavy rainfall, downstream impacts from soil erosion are not expected. The repair of vandalism damage to existing check dams is not expected to impact existing water quality. The repairs will replace missing or damaged and bags and cover them with soil. No new check dams are planned. The construction of the fence is not expected to have an significant effect on water resources.

As the maintenance will be completed during the dry season, downstream impacts (water course, water quality and turbidity levels) will not occur from construction activities.

The primary water quality concern is the potential release into drainages, of toxic materials such as diesel fuel, oil and other hazardous materials used during construction. To reduce the potential for spills, refueling and emergency repair areas will be located well away from washes. Any spill of toxic material will be reported immediately, contained by earthen dikes or sand bags and remedied immediately. Clean material will be used to construct structures; no polluted silts or other material will be placed in the washes. Debris and rock will be removed upon completion of the project. During floods, long-term erosion impacts may occur from scouring effects on the upstream side of

structures. The placement of culverts is essential to make the roads passable. Impacts to water resources during construction of the culverts will be minimal and very short-term (a few days per culvert, usually less) The project-related impacts to water quality will be minor.

5.2.2 Biological Resources.

5.2.2.1 Vegetation.

The majority of the road improvement will remain on the existing road alignment, minimizing disturbance to vegetation. Vegetation, consisting primarily of grasses and shrubs, will be cleared where road improvements are necessary, at staging and bivouac sites, and where the fences will be constructed at the Border Patrol station.

Impacts to vegetation at the staging and bivouac areas and at the Border Patrol station will be minor due to previous disturbance.

No Action: This alternative will have no impact on vegetation in the area.

Proposed Action: Construction of the proposed project will result in the loss of semidesert grassland vegetation. The greatest amount of disturbance will be in the vicinity of the mountain road segment of the project, where the road needs considerable improvement. In addition to common grasses, this road improvement will involve the loss of several prickly pear cactus and ocotillo shrubs. Removal of agave will be probably limited to two small plants (about 6" high and 6" in diameter). If possible, these plants will be transplanted elsewhere on the site. A nearly mature agave near the two small plants will be avoided if possible. The following additional impacts are also anticipated:

a. Culvert 1.1 mi. east of airport gate. Minor loss of snakeweed, creosote bush, and whitethorn acacia.

b. Culvert 1.6 mi. east of airport gate. Minor loss of grasses, especially sacaton, possibly creosote bush.

c. Possible ditch around curve. 3.4 mi. east of airport gate, small mesquite, grasses, snakeweed, and thorn bush (Lycium sp.). may be removed or disturbed.

d. Staging area just east of Douglas. No significant impacts will occur because the site is an unvegetated slag deposit.

R e. Whitewater Draw. Rocks to improve the crossing will not significantly impact the vegetation at this site.

f. Repair or replace cattle guard, 3.5 mi. west of Whitewater

Draw. Construction may require the removal of one mesquite.

g. Bivouac area at rifle range. The area is highly disturbed, and little impact to vegetation is anticipated.

5.2.2.2 Fish and Wildlife.

With the loss of vegetation there is the associated loss of wildlife habitat and the displacement of some wildlife. The proposed drag road will result in an insignificant reduction in animals whose home range is in or just adjacent to the road, but no change in the overall species diversity of the area is expected. The proposed action will have little or no impact on fish because construction will not take place in a flowing river or standing water, except for the placement of rock in Whitewater Draw.

Removal of desert grassland habitat will eliminate or displace common wildlife species such as quail, doves, and wood rats. Impacts to these common species are not significant. Loss of shrubs for deer browsing will be insignificant relative to the available habitat of similar or higher quality in the region. The loss of habitat, including mesquites, could displace or eliminate other wildlife, including raptors and other birds. Due to the minor extent of such habitat loss, impacts to wildlife will not be significant. No significant habitat fragmentation or isolation of wildlife populations is expected from the proposed drag road improvement.

5.2.3 Endangered and Threatened Species.

No Action: This alternative will not impact threatened and endangered species.

Proposed Action: The proposed action is not expected to impact federally listed endangered or threatened species. The only listed Threatened or Endangered plant species potentially occurring in the project area is the threatened Cochise pincushion cactus; however, as stated earlier, the probability that undocumented localities of this species exist is small (Rutman 1992): therefore, the project is unlikely to affect this species.

A primary concern of this project is the potential impact on lesser long-nosed bat as a result of the clearing of agave plants which are used by the bats as a primary food source while on the northern part of their range. Although the species probably does not roost within the proposed project area, it may potentially feed upon the agaves on-site between May to October.

As mentioned earlier, agave stands in the project area occur mostly in clumps or isolated colonies. While it may not be possible to avoid every agave plant in the proposed project area,

it will be possible to relocate any agave plants that cannot be avoided. A biologist will be present during the initial survey of the road and during construction in the mountain pass portion of the road to ensure that all non-flowering paniculate agave plants in the project area will be avoided or relocated elsewhere in the project area. With this mitigation, the proposed drag road will have no effect on the lesser long-nosed bat.

R COE staff coordinated with the Arizona Department of Agriculture regarding transplanting agave. They will provide instruction to the project office and COE biologist in Douglas on how to transplant agave.

R 5.2.4 Candidate Species; Special Status Species.

Several of the federal candidate and state special status species have a moderate to high potential for occurring on site, but none were observed during the Corps November 4, 5, and 30, 1992 field investigations. No significant impacts to candidate or special status species are anticipated. The project is expected to have no impact to the Candidate 1 willow flycatcher or cactus ferruginous pygmy owl because the project will not affect habitat where these species are likely to occur. Minor impacts to the Mexican garter snake, Chiricahua leopard frog, and/or lowland leopard frog may occur if these species occur in Whitewater Draw. Impacts would primarily be associated with turbidity, and would be short term. A vehicle is unlikely to crush an animal in crossing the river, because the water level and topography prevent crossing at high speeds. Since vehicles routinely cross the river on this road, no eggs of either frog species are likely to be present where the work is proposed. The proposed action could potentially affect foraging habitat of any of the three candidate bat species which may feed in the project area. The impact, if any, would be minor because loss of breeding and roosting habitat, not lack of foraging habitat, is believed to be the primary reason for the population decline of the California leaf-nosed bat and the southwestern cave bat. Measures to avoid impact to the endangered lesser long-nosed bat will also protect the Mexican long-tongued bat. The project has some potential to impact the canyon spotted whiptail and Texas horned lizard. There is also a slight potential to affect the candidate plants, especially perennial herbs that were not visible during the surveys, where construction activities require deviation from the existing road alignment.

5.2.5 Air Quality.

No Action: This alternative will not impact air quality.

Proposed Action: There will be an increase in local air pollution from the vehicles and equipment used during construction. Emission sources will be limited primarily to construction equipment and vehicles use to transport construction materials and carry out maintenance processes. Construction

emissions from motorized vehicles will not be significant since it will only contribute a small amount of pollutants for a short period of time. To reduce the impact on the air environment, construction equipment will be required to have a muffler in accordance with the equipment manufacturer's specifications. The exhaust system of all vehicles must be maintained in good operating condition, free from leaks and holes. Minor adverse impacts may be associated with fugitive dust particles. A water program will be employed to control particulate matter. Long term impacts will be insignificant. On completion of the project, the drag road and mountain roads will be used for an average of 2 to 5 vehicle passes per day. The emissions generated by these vehicles will be negligible and below State level of significance. The proposed project is subject to Federal, State and county air quality regulations and standards (Clean Air Act; Section 5.0). Air quality impacts will be localized, short-term and insignificant.

The installation of the fences at the Border Patrol Station will, with standard construction measures, not significantly affect air quality.

5.2.6 Noise.
No Action: This alternative will not impact on the noise quality in the area.

Proposed Action: Construction activities will increase the noise level for the short-term. To reduce the noise impact on the environment, construction equipment will be required to operate in compliance with all applicable Federal, State and local laws and regulations relating to noise levels permissible within and adjacent to the project construction site. All construction equipment will be required to have mufflers in accordance with the equipment manufacturer's specifications, or a system of equivalent noise reducing capacity. Long term impacts will be insignificant. On completion of the project, the drag and mountain roads will be used for an average of 2 to 5 vehicles passes per day. The noise generated by these vehicles will be negligible and below State levels of significance. Noise quality impacts will be localized, short-term and insignificant.

5.2.7 Cultural Resources.
All archeological sites will be avoided by road improvement activities. Except for the new 1 1/2 mile segment of new road improvement activities, all work will take place within the boundaries of the original road improvement project. In addition, construction will be monitored to ensure that construction crews will stay within the established project area, and away from the previously identified archeological sites.

5.2.8 Hazardous and Toxic Material.
No Action: This alternative will not introduce hazardous or

toxic materials to the area.

Proposed Action: The proposed action will have the potential to increase the use of toxic material such as diesel fuel, lubricating oils and solvents. Any spill of toxic material will be reported and remedied immediately to prevent any significant impacts to the area.

6.0 COORDINATION.

6.1 REVIEW AGENCIES AND ORGANIZATIONS.

Environmental consultation and/or coordination was accomplished with agencies and offices listed in the section. Typically, the representative of the agency or organization was briefed about the project by U.S. Army Corps of Engineers in person, by telephone or by written correspondence. Comments or concerns were then incorporated into this Final EA.

The COE has informally coordinated the proposed project with the following agencies and individuals:

Joint Task Force Six
U.S. Army, 864th Engineer Battalion, Fort Lewis, Washington
U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office
U.S. Bureau of Land Management, State and Safford District Offices
U.S. Customs Service, Douglas, Arizona
U.S. Border Patrol
International Boundary and Water Commission
Arizona State Land Department
Arizona Department of Water Resources, Water Resources Board
Arizona Department of Agriculture, Plant Services
Arizona Department of Transportation
Arizona Department of Game and Fish
Arizona Department of Health Services, Office of Risk Assessment and Investigation
Department of Environmental Quality, Water Assessment Section, and Office of Air, Arizona
State Historic Preservation Officer
Arizona Department of Transportation, Environmental Planning Service
Cochise County Planning Department
Cochise County Department of Public Works
City of Douglas, Planning Department
Phelps Dodge Corporation
Audubon Society
Warner and Wendy Glenn

R The COE informally coordinated the proposed project with the U.S. Fish and Wildlife Service (FWS), Arizona Ecological Services Field Office during the preparation of the Draft EA. The Corps of Engineers requested, in a letter dated December 4, 1992, that the FWS provide updated endangered species information in compliance with Section 7 of the Endangered Species Act (Appendix A). FWS provided a response dated January 6, 1993 (see Appendix A). FWS visited the site with COE, ADGF, ADA and Border Patrol representatives on 30 November 1992. Additional informal coordination to clarify monitoring requirements took place on January 29, 1993. FWS also provided review comments the EA (see 6. below). Coordination with FWS to limit and avoid impacts to biological resources is ongoing and will continue throughout

construction

R The COE informally coordinated the project plan with Arizona Department of Game and Fish (ADGF), through Mr. Richard Gerhart. ADGF visited the project site on 30 November 1992. A request for a list of special status species was sent to AGF on December 7, 1992. In a letter dated December 22, 1992, AGF responded that no state special status species occur in the Douglas project area. Letters are included in Appendix A.

R Water Quality Management Unit (WQMU), Arizona Department of Environmental Quality (AZDEQ), suggested that COE submit WQMS-301.030 forms to document compliance with Water Quality Standards. JTF-6 will provide the required information. COE informally coordinated this information with Ms. Melinda Longsworth, WQMU, Tucson on 19 Jan 93.

On 20 Jan 93, COE coordinated with Mr. James Matt, AZDEQ regarding State 401 Water Quality Certification. Mr. Matt stated that when a project qualifies for Nationwide Permit #14, "Road Crossing" as the Douglas project does, the project is considered precertified for the Water Quality certification.

The COE informally coordinated with Andra Juniel, Office of Air, Arizona Department of Environmental Quality concerning potential project-related impacts on air quality. It was noted that construction equipment would generate fugitive dust particles, and during construction period, JTF-6 should employ a watering program to reduce airborne dust. The project-related impacts will be short-term, and therefore will not require a permit.

The COE has informally coordinated with Mike Dawson, Arizona Department of Transportation, Environmental Planning Service (ADTEP). The ADTEP requested a copy of the Draft EA for review.

R The COE informally coordinated the proposed project with Bob Archibald and Darlene Haegele, U.S. Bureau of Land Management, (BLM) State and Safford District Offices, respectively, during the preparation of the Draft and Final EAs.

The COE informally coordinated the proposed project with Frank Amarillas, U.S. Customs Service (USCS) during the preparation of the Draft EA.

The COE informally coordinated the proposed project with David Creighton, Arizona Department of Water Resources, Water Resources Board during the preparation of the Draft EA.

R The COE informally coordinated the proposed project with the Cochise County Planning Department during the preparation of the

Draft and Final EAs.

The COE informally coordinated the proposed project with Robert Martin, City of Douglas, Arizona, Planning Department during the preparation of the Draft EA.

R The COE informally coordinated the proposed project with Steve Hildreth and Bill Fish, Arizona State Lands Department during the preparation of the Draft and Final EAs.

The COE informally coordinated the proposed project with the Audubon Society, Tucson Chapter, during the preparation of the Draft EA.

The COE informally coordinated the proposed project with Warner and Wendy Glenn, local land owners, during the preparation of the Draft EA.

The COE informally coordinated the proposed project with the J. H. Zamar, Phelps Dodge Corporation during the preparation of the Draft EA.

The COE informally coordinated the proposed project with the Arizona Department of Health Services, Office of Risk Assessment and Investigation during the preparation of the Draft EA.

R The COE coordinated the proposed project with Robert Dummer of the COE Regulatory Office, (AZ) during the preparation of the Draft and Final EAs. The proposed project was determined to be eligible for Nationwide Permit, No. 14, Road Crossing. Because the construction area is less than one acre at each road crossing, Mr. Dummer stated that when working along Whitewater Draw, construction activity must be limited to the existing roadbed. This has been added to the Environmental Commitments Section.

R The COE coordinated the proposed project with JTF-6 during the preparation of the Draft and Final EAs.

R The COE informally coordinated the proposed project with Ltn Ken Nadermann, 864th Engineer Battalion, Fort Lewis, Washington during the preparation of the Draft and Final EAs.

R The COE informally coordinated the proposed project with John Salem, Arizona Department of Agriculture, (ADA) Native Plant Services Division, during the preparation of the Draft and Final EAs. Mr. Salem participated in the November 30 field visit. ADA requested that the Corps provide the ADA a copy of the DEA to review for compliance with the Arizona Native Plant Law. During preparation of the final EA, coordination with Mr. Salem and Mr. Jim McGinnis indicated that except for the agaves, no other salvageable protected native plants are expected to be affected

by the project. Ms. Catherine Werts of the Bisbee ADA office has agreed to brief the troops on the techniques for transplanting the agaves.

R The COE informally coordinated the draft and Final EAs with the U.S. Border Patrol at Douglas, Arizona. On 4 November 1992, Corps Geographer Gene Seagle and Corps biologist Lois Goodman met with Agent Dwayne Hudson, U.S. Border Patrol, Douglas, Arizona Office, to discuss project plans and objectives. Ms. Goodman returned to the site for further investigation on 5 November. COE (Seagle and Goodman), ADGF, USFWS, ADA and Border Patrol met at the site on 30 November 1992. Border Patrol provided transportation for all field work.

R On 14 December 1992 COE staff coordinated with Mr. Don Crawford of the International Boundary and Water Commission staff regarding the proposed project. Mr. Crawford advised that the Draft Environmental Assessment should be forwarded to the IBWC office for comment. JTF-6 staff will submit a letter of request for military personnel to work along border. IBWC's comments and responses to those comments are included.

6.1.1 Public Review of the Draft EA

The 30 day public review period for this document ended 21 January 1993. Copies of the Draft EA were sent to those listed on the mailing list. Multiple copies of the Draft EA were sent to the Douglas Public Library and the Cochise County Community College Libraries. Copies of the Notice of Availability (Appendix D) were posted at public bulletin boards at Mega Foods, the Post Office, City Hall and the Port of Entry in Douglas, Arizona on 24 December, 1992, for public review. A Notice of Availability was provided to JTF-6 to be provided to The Douglas Daily Dispatch.

6.2 COMMENTS

In the process of preparing this EA, Federal, State, Local agencies and members of the public known to be interested in the project were informally coordinated with for comment to comply with the Environmental Statutes identified in Section 7.0. Letters of comment are included in Appendix C. Copies of the Final EA will be forwarded to those who commented on the Draft EA.

The following section summarizes the written and verbal comments provided on the Draft EA and responds to those comments.

U.S. Fish and Wildlife Service - Ecological Services

Comment #1. "We request notification of on-going construction work, including dates, if the original construction schedule is revised and work continues past April 9, 1993."

Response #1. Noted, see Section 8.0. The Service (FWS) will be notified of start-up dates for the project, including any delays. Notification may be informal, by telephone, because the Corps does not always have sufficient lead time to prepare a formal written notice.

Comment #2. "We recommend that the EA clearly state who is responsible for ensuring that environmental constraints are adhered to, and that biological monitors be provided to facilitate compliance with the EA. A qualified biologist should act as monitor and should be present at the site at all times, from initial surveys through final clean-up. The biologist and all construction personnel should be briefed on the environmental commitments made in the EA."

Response #2. The Corps will provide copies of the Environmental Commitments to Captain Hobson and Lt. Ward, the project officers for the construction battalion, and they will be responsible for ensuring that environmental commitments are met. A Corps biologist, possibly with the assistance of a representative of the Arizona Department of Agriculture will mark plants and/or areas to be avoided, prior to construction. On 29 Jan. 1993 Corps staff coordinated with FWS regarding monitoring the construction. FWS agreed that a total of about 7 days monitoring by a qualified biologist will be acceptable for compliance: at the beginning of construction, at significant sites, and at the close of construction and clean-up. The mountain pass area is considered to be the most sensitive area biologically and most in need of monitoring.

Comment #3. "The Service recommends that the Army determine if better erosion prevention techniques are available that will

withstand the rainfall patterns and erosion common in the area. Revegetation or use of articulated revetment along the banks of washes in the immediate vicinity of the road and surrounding culverts may also help to reduce erosion."

Response #3. JTF-6 and the 864th Engineering Battalion Staffs have evaluated the options available to achieve the goals of the Douglas project, namely, repair of the road segments in a timely and cost effective manner, while providing training opportunities for the troops. Within the time and financial constraints of the participants, the use of revegetation and articulated revetment were found to be impractical. The timing of the project in the historically drier part of the year, the visual confirmation of erosion patterns from previous erosion control efforts by others and the concentration of this project on maintenance of the roads allows this project to comprehensively address the past erosion problems of the Douglas drag roads.

Comment #4. "The Service does not see the need for clearing an additional 10 feet of land along-side the existing road during maintenance activities. Almost all of the existing road is more than sufficiently wide for its intended use, and the Service believes that construction activities can be limited to the existing cleared surface."

Response #4. The road will be improved only to its existing width. During project construction, the area bordering the existing roads will be used only for vehicles in specific circumstances, such as turning vehicles around, allowing passage of head-on traffic, or unloading materials. It is not intended for normal travel, nor is it planned as a permanent expansion of the existing roadbed. Significant plant and cultural resources will be marked prior to construction to avoid impact to these resources. This subject has been informally coordinated with FWS staff on 29 Jan 93 by COE staff.

Comment #5. "On the mountain road, clearing an additional 10 feet could result in major vegetative disturbance. ...The Final Report should indicate the types of transplanting techniques that will be used to ensure that relocated plants will survive. In addition the EA should indicate who will be responsible for transplanting the agave."

Response #5. As noted above, the potential road edge disturbance is not a permanent addition to the roadbed, but an allowance for vehicles to pass head-on, turn around or load/unload material where not possible on the existing roadway. For the majority of the road alignment, the road edge will not be cleared or disturbed. The Arizona Department of Agriculture will brief the Army on the procedures for transplanting agaves. Field surveys in November and December 1992 indicate that all but two or three agaves in the Douglas project area can probably be

avoided. The Army will transplant agaves according to ADA procedures.

Comment #6. "The Service understands that some widening will be necessary in order for heavy equipment to pass through. However, we believe these sites should be specifically identified, approved through the biological monitor, and marked. Areas not marked should not be cleared. The statement that "An additional 10-feet ... along road sides will be used for construction limits...." should not be perceived as a blanket approval for unnecessary or avoidable vegetation removal."

Response #6. Disturbance will be minimized throughout the project by marking plants and areas to be avoided. This marking will be accomplished by a qualified COE biologist and possibly, a representative of the Arizona Dept. of Agriculture prior to project construction. The limited nature of use intended for the road edge will be distinctly explained to construction personnel and the site monitors. The road edge is not considered a blanket approval for unnecessary or avoidable vegetation removal. See Section 8.0

Comment #7. "The EA indicates that gravel will be placed in Whitewater Draw and other washes to improve traction and help reduce erosion. The Service requests that the final EA clarify the permitting process applicable to these actions."

Response #7. See Responses 2 & 4 of Arizona Department of Environmental Quality, Water Assessment Section.

Comment #8. "The Service supports the use of areas disturbed during last year's road construction activities for staging areas and bivouac sites. We request that activities in the areas be kept within the current boundaries of disturbance."

Response #8. The proposed plan calls for all staging and bivouac sites to utilize those sites used in the past and JTF-6 will confine all activities to those area used in the past.

Comment #9. "... the borrow area and waste disposal mentions the use of 'Flux' to stabilize road surfaces. Clarification is necessary to determine whether this is a process or chemical that will be used. In addition the intent behind the sentence 'All material used on roads and in washes will have organic material removed for stability' is unclear."

Response #9. The term "flux" has been replaced with the term "gravel smaller than 3/8 inch" to avoid confusion. The phrase "all material used on roads and in washes will have organic material removed for stability" simply means that fill material will not utilize organic materials since they impart undesirable compression and decomposition characteristics to the fill. The

sentence has been rewritten to clarify this point.

Comment #10. "The Service disagrees with the statement that erosion potential is low to moderate for this project site. ...Our comments on prevention of future erosion are discussed above."

Response #10. See Comments and Responses 3-9, addressed above.

Comment #11. The Service requests that scientific names follow the common names the first time a species is referenced within the text. In addition, the following species should be added to Table 1 as observed species:

Sporobolus airoides	Alkali Sacaton
Calliandra eriophylla	Fairy Duster
Opuntia violacea	Purple Prickly Pear
Prosopis juliflora var. velutina	Velvet Mesquite

Response #11. We concur that scientific names are normally used when first referring to a species. Due to the unusually high number of plant and animal names in the text, the scientific names are included in Table 1 (plants) and Table 2 (and mammals). The additional plant species have been added to Table 1. The text has been revised to indicate that the scientific names can be found in the tables. Due to the small number of reptile and amphibian species, the scientific names have been incorporated into the text.

Comment #12. "Due to the lack of scientific names, there is some confusion as to which deer species are referenced in the EA. Section 4.2.2.2 mentions mule deer (Odocoileus hemionus crooki), white-tailed deer (Odocoilus virginianus (sic) couesi) and Coue's deer. It is unclear which species is meant by Coue's deer.

Response #12. Section 4.2.2.2 has been revised to clarify the ambiguity about the deer species present. The FEA refers to Table 2, which has been added to the document, for scientific names.

Comment #13. "Both the reptile/amphibian discussion and the bird discussion mention additional species which might occur in the area . Attached is a list of additional mammal species which may occur in the area based on habitat preference, actual observations, and distribution maps as provided in Brown (1973 and 1982) and Hoffmeister (1986). This list could be incorporated as Table 2.

Response #13. We appreciate this additional list of mammals. We have added the list to the final EA as Table 2 as suggested.

Comment #14. "Brown (1982) also indicates that the following

reptile species are often associated with this type of habitat:
Desert Box Turtle (Terrapene ornata luteola)
Desert Grassland Whiptail (Cnemidophorus uniparens)
Mexican Hognose Snake (Heterodon nasicus bennerlyi)
Southwestern Earless Lizard (Holbrookia texana scitula)
Western Green Toad (Bufo debilis insidior)
Western Hooknose Snake (Ficimia cana)

In addition, you may want to reference the enclosed copy of a brochure provided to our office by Greg Yuncevich with the Bureau of Land Management for bird species observed at the site."

Response #14. The additional reptile and amphibian species have been added to the FEA, section 4.2.2.2. The western green toad probably does not occur in the project area. It is a state candidate species, but it was not included on the Arizona Game and Fish list of special status species for this project. The brochure is useful, but since it covers a much larger and more diverse area than the proposed project area, it is not included in the final EA.

Comment #15. "While candidate species are not protected under Federal Law, we recommend your consideration of them during project development."

Response #15. Candidate species have been considered in the development and evaluation of this project. Sections 4.2.4 and 5.2.4 of the EA have been revised based on more recent information (FWS letter, January 6, 1993).

Comment #16. "Paragraph 2, page 23: Delete the sentence 'These bats are adapted for life in arid deserts of the southwestern U.S., Mexico, and Central America.' These bats live in areas other than arid deserts."

Response #16. The sentence has been deleted.

Comment #17. "Paragraph 2, page 23: Change the third to last sentence to read 'In the Fall (October and November) the bats migrate south to feed on later blooming agaves and in winter feed on flowering trees of central and southern Mexico.'"

Response #17. The FEA includes the revision.

Comment #18. "Paragraph 3, page 23: Delete 'specialized' from the second sentence."

Response #18. The word has been deleted.

Comment #19. "Paragraph 1, page 26: Delete '(at night)'".

Response #19. The phrase has been deleted.

Comment #20. "Section 4.2.4 discusses candidate species. Information provided by the Arizona Game and Fish Department (AGFD) concerns State listed species. The AGFD maintains separate lists of species identified as endangered, threatened or candidate at the State level."

Response #20. Section 4.2.4 has been revised to include updated information provided by FWS and AGFD, and the title has been changed to include other special status species. Updated information indicates no state special status species are expected in the Douglas project area.

Comment #21. "Section 6.0 on Coordination references the Service as the U.S. Fish and Wildlife Service. Please expand this to read 'U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office'".

Response #21. Expanded, see Section 6.0.

Comment #22. "Our primary concern continues to be the failure to address the cumulative effects of the JTF-6 projects being implemented... ..The EA states that the Ft. Worth District Corps Office is preparing a programmatic Environmental Impact Statement (EIS). However, we have received no notice as to the progress of this report."

Response #22. JTF-6 projects must be accomplished quickly on an as-needed basis. All coordination and NEPA requirements are met. JTF-6 projects a assessed to include mitigation and monitoring, where appropriate. It is the intent to meet all environmental commitments. Fort Worth District, COE, has been tasked to prepare a programmatic EIS that addresses the type of actions JTF-6 may be asked to respond to and is now involved in the planning process for that document. Resource agencies will be afforded an opportunity to provide input during the scoping period.

International Boundary and Water Commission - United States Section

Comment #1. "We ask too, that no waste or construction materials be piled in the areas near the international boundary."

Response #1. Noted, see Section 8.0

Comment #2. "We ask that any fence or road work not take place any closer than two feet north of the boundary to avoid any accident of encroachment into Mexico."

Response #2. Noted, see Section 8.0

Comment #3. "We ask that you provide PE Jose S. Valdez (915)-534-6693, the plans for these drainage structures as soon as possible for our review, insofar as it impacts transboundary drainage."

Response #3. The proposed plan calls for the installation of culverts for erosion control; no transboundary drainage modification is expected. JTF-6 has notified IBWC of the proposed construction by letter dated 27 Jan 93 (Appendix C).

Arizona Department of Environmental Quality - Water Assessment Section

PART A

Comment #1. "Section 2.2.5 Bivouac Area: Be advised that other permits or approvals may be required by County Health Departments, ADEQ or the U.S. EPA when the overall project includes a potable water supply, wastewater reuse facilities, or wastewater collection/holding/treatment/disposal facilities."

Response #1. COE informally coordinated with Water Quality Management Unit, Arizona Department of Environmental Quality (WQMU), suggested that the COE submit WQMS-301.030 forms to document compliance with Water Quality Standards. JTF-6 was forwarded the required information. JTF-6 will obtain all necessary permits prior to construction. JTF-6 has coordinated with Cochise County Health Services.

COE informally coordinated the proposed project with David Creighton, Arizona Department of Water Resources, Water Resources Board and with the Arizona Department of Health Services, Office of Risk Assessment and Investigation during the preparation of the Draft EA. COE staff coordinated with Mr. Don Crawford of the International Boundary and Water Commission staff regarding the proposed project.

Comment #2. "Section 2.2.6 Borrow Area and Waste Disposal: All off site material sources for the project must have valid and current permits under Federal Clean Water Act [Section 402 (NPDES) and 404 (Dredge and Fill)] and the State Aquifer Protection Program, where necessary."

Response #2. Most of the required material will be obtained from the vicinity of the project area; if any additional material is required, it will obtained through Fort Huachuca's Vendor Contracting Office, with the stipulation that all material will come from quarries.

The proposed project qualifies for 33 CFR Part 330-

Nationwide Permit, # 14, Road Crossing. Section 404 (b)(1), Water Quality Evaluation is included in Appendix A. COE coordinated with Mr. Robert Dummer, (COE Regulatory Branch, Phoenix) on 19 Jan 93 regarding 404 permits, and confirmed that this project qualifies for Nationwide Permit #14.

On 20 Jan 93, COE coordinated with Mr. Jim Matt regarding State's 401 Water Quality Certification, and Mr. Matt stated that when project is qualified for Nationwide Permit, the project is "precertified" for 401 State Water Quality Certification.

JTF-6 has coordinated with Arizona Department of Environmental Quality regarding Section 402 (NPDES) permits. The vendors used by Fort Huachuca will be using quarried materials, and the project will not be discharging waste into rivers or streams.

Comment #3. "Section 6.0 Coordination: 'Arizona Department of Environmental Quality, Water Quality Management Section' should read 'Arizona Department of Environmental Quality, Water Assessment Section'".

Response #3. Noted, see Section 6.0

Comment #4. "Section 7.5 Clean Water Act of 1977, as amended (Public Law 95-217): This project may qualify under Nationwide 404 Permit but it still require(s) state certification by ADEQ. Identify which Nationwide Permit this project qualifies under (by number) and contact Mr. James Matt at (602)-207-4502 to determine whether a state certification is necessary."

Response #4. Coordination with Robert Dummer, Corps of Engineers Regulatory Office, Arizona, on 11/18/92 and 1/19/93, determined that the project as proposed qualifies for Part 330, Section #14 of Nationwide Permit Program. Coordination with James Matt determined that when a project qualifies for Section #14, as does this project, that Section 401 is "Precertified".

Comment #5. "Section 8.0 under Environmental Commitments: When this project is physically commenced at the construction site, ADEQ must be notified within seven days of the start date. When this notification is made, please provide the start date and the name of a contact person to be on site. When the project is complete ADEQ must be similarly notified.

Response #5. Noted, see Section 8.0.

Comment #6. "Section 8.3 under Environmental Commitments: Please elaborate on 'Appropriate control techniques' that will be used to minimize turbidity in the washes during construction."

Response #6. Since nearly all construction in or near washes

will take place when the washes are dry, minimal impact on turbidity is expected. Impacts will be further reduced by compaction of the worked ground with rollers and "elephant's feet" compactors, to stabilize the ground surface and reduce runoff. In event of heavy rain or flood, construction will be postponed until washes are dry.

Comment #7. "Section 8.5 under Environmental Commitments: "'...debris and rock will be removed ...' should read '...construction debris and rock will be removed...'".

Response #7. Noted, see Section 8.5.

Comment #8. "Section 8.6 under Environmental Commitments: "'Debris in washes...' should read 'Construction debris in washes...'".

Response #8. Noted, see Section 8.6.

PART B
Comment #1. "Throughout the text, Whitewater Draw has been incorrectly referred to as White water Wash.

Response #1. Noted.

Comment #2. "Please add the following name to the mailing list and coordinate all future project through this person:

Mr. Edwin K. Swanson, P.E.
Arizona Department of Environmental Quality
Water Assessment Section
P.O. Box 600
Phoenix AZ 85001-0600
(602)-207-4501

Response #2. Noted.

Comment #3. "To ensure timely acquisition of a state certification (if necessary, see item A.4. above), ADEQ should be consulted during the initial planning and coordination phase of the project. The person to be contacted is listed in item A.4."

Response #3. Noted.

Comment #4. "ADEQ Non-point Source personnel have requested that all EAs acknowledge and make reference to Arizona Executive Orders No. 89-16 and 91-6 which pertain to protection of streams and riparian areas. These Executive Orders are attached for you to use in this EA as well as in all future EAs."

Response #4. Noted, see Section 7.0.

Arizona Department of Environmental Quality -
Air Quality Planning Section

Comment #1. "We recommend that you take certain preventive and mitigative steps to minimize any potential particulate pollution problem throughout the various stages of the project.

While preparing the site:

1) minimize land disturbance;
2) use water trucks to minimize dust;
3) cover trucks when hauling dirt;
4) use windbreaks to prevent accidental dust pollution and
5) limit vehicular paths and stabilize temporary roads

While completing the project:

1) cover trucks when hauling dirt;
2) water or use dust palliatives on traveled unpaved roads;
3) minimize unnecessary vehicular and machinery activities and
4) minimize dirt track-out by washing or cleaning trucks before leaving the project site.

While terminating the project:

1) revegetate any disturbed land not used;
2) remove unused material;
3) remove dirt piles and
4) revegetate all vehicular paths created while completing the project to avoid future off-road vehicular activities.

Response #1. Air quality will be addressed with the following actions:

Preparing the Site:
Items 1, 2, and 5 will be used in this project. Items 3 and 4 will not be used as no dirt hauling is expected, and windbreaks are not practical on this project.

While completing the project:
Item 1 is not applicable as dirt will not be hauled.
Items 2 and 3 will be used on this project.
Item 4 is applicable to construction vehicles only on final haul-out of the project. They will be cleaned as part of their routine haul-out procedure. Item 4 applies to vendors vehicles only in the event of deliveries in wet conditions, this is not anticipated with this project, as heavy rain will postpone construction.

While terminating the project:

Items 2 and 3 will be used on this project. Items 1 and 4 will not be used on the project.

Arizona Department of Agriculture - Plant Services Division

Comment #1. "We would appreciate that all protected plant species be considered prior to project development, future road repair and maintenance."

Response #1. COE and JTF-6 will continue the established coordination with ADA-Plant Services.

Comment #2. "Please keep in mind that for individuals to remove protected native plant from the project area, an application for plant removal and transportation permit must be completed and signed by the land manager or agent."

Response #2. The project does not call for protected plants to be removed from the project site. Permits will be obtained if any protected native plants are removed from the project area.

Arizona Game and Fish Department

Comment #1. "... Among our concerns ... was the need for a qualified biologist to be present during the project in order to insure that environmental commitments are complied with. We note that this has been incorporated into the EA (section 8.10). Provided this and other commitments are implemented as described, we would agree with the finding of no significant impact that the project will not result in significant impacts to biotic resources."

Response #1. Comment Noted.

Arizona State Land Department

Comment #1. "...recommends that the USA COE submit to the ASLD a list of all Federal, State, and/or local environmental permits (with permit number) required for the project."

Response #1. Noted, list sent to ASLD on 4 February 1993 (See Appendix C).

Comment #2. "In addition, the USA COE should be required to notify the ERTS within 24 hours (emergency situation) or within 30 days (non-emergency situation) of any environmental noncompliance or cultural resource discovery."

Response #2. Noted, see Section 8.0.

Arizona State Parks - State Historic Preservation Office

Comment #1. "In my opinion, the Draft EA adequately considers potential impacts to cultural resources and includes provisions for consultation with this office. Thus, we accept the EA as written and also concur with the agency's Finding of No Significant Impact (FONSI)."

Response #1. Noted.

Cochise County Department of Public Works

Comment #1. "Be advised that a Right-of-Way Permit will be required if the proposed work will significantly impact any existing County roads or rights-of-way."

Response #1. Proposed project will not involve improvement to county roads, so no permits are required. JTF-6 coordinated with Cochise County on 27/28 Jan 1993 regarding the project.

Comment #2. "Please fill it... (right-of-way application)... out and provide information which will allow this office to determine whether a permit will be required."

Response #2. This request is not applicable to the proposed project, as JTF-6 has coordinated with Cochise County.

Cochise County Planning Department - Building and Zoning Division

Comment #1. "This Department would, however, request that the Border Patrol Facility in Douglas apply for an informational permit to establish the proposed fencing around their station."

Response #1. Permit and letter were forwarded to U.S. Border Patrol, Douglas for completion. U.S. Border Patrol will submit required permit application.

7.0 COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS. All applicable laws, regulations, and Executive Orders were considered during preparation of this environmental assessment. Those pertinent to this action are discussed as follows:

7.1 National Environmental Policy Act of 1969 (Public Law 91-190). This EA has been prepared in accordance with the goals and requirements of the Act. The proposed project complies with applicable environmental regulations as outlined in the following paragraphs.

7.2 National Historic Preservation Act (Public Law 94-43). Prior to initiation of construction, JTF-6 will coordinate with the SHPO pursuant to Section 106 of the act (36 CFR 800). Once we receive concurrence from the SHPO that the proposed project will not effect National Register eligible properties, the project will be in full compliance.

R 7.3 Endangered Species Act of 1973, as Amended (Public Law 93-205). The Corps of Engineers requested, in a letter dated December 4, 1992, that the FWS provide updated endangered species information in compliance with Section 7 of the endangered Species Act. Endangered species information was provided by letter dated December 22, 1992. Endangered species and other species of concern are addressed in this EA. The proposed project will not affect any of the endangered species known or potentially in the project area. Formal consultation pursuant to Section 7 of the Act is not required. This EA analyzes the potential impacts to listed species and determined that with environmental commitments which are part of the project, the proposed action will have no effect on any listed species. Therefore, formal Section 7 consultation is not required.

7.4 Fish and Wildlife Coordination Act (Public Law 85-624). This project will not impound, divert, or deepen the channel of any stream or other body of water. Nor will this project otherwise control or modify any stream or body of water (as described 16 USC 662 (a)). Therefore, the Fish and Wildlife Coordination Act is not applicable to this project. COE has coordinated this project with the U.S. Fish and Wildlife Service and the Arizona Department of Game and Fish.

R 7.5 Clean Water Act of 1977, as amended (Public Law 95-217). In compliance with Section 404 of the Act, a 404(b)(1) evaluation has been prepared (Appendix B). Project area roads pass through a number of washes. Culverts will be placed along about seven smaller ones. JTF-6 has submitted appropriate documentation to Arizona WQMU for compliance with State water quality standards (Appendix B). All project elements meet criteria for Nationwide permit. The area impacted by the construction of a culvert along each wash will be less than one acre. The repairing of existing check dams (repair/replace sandbags) will then be covered with

soil to reduce their attractiveness to vandals. No new check dam construction is planned. The proposed construction is covered under Nationwide Permit No. 14.

7.6 Clean Air Act, as Amended (PL 91-204). Federal agencies must comply with all Federal, State, interstate and local requirements respecting the control and abatement of air pollution, including any requirement respecting permits. Informal coordination with the Office of Air, Arizona Department of Environmental Quality, indicates that a watering program should be employed during construction to reduce fugitive dust. Because project-related impacts are short-term, a permit will not be required.

7.7 Executive Order 11990, Protection of Wetlands. Wetlands protection includes the avoidance to the maximum extent possible of long and short term adverse impacts associated with the destruction or modification of wetlands and avoidance of support of new construction in wetlands. The proposed project involves no new construction or maintenance in wetlands. Construction of culverts will take place within dry washes. The only planned action in the one flowing stream bed is placing gravel on the existing crossing to increase traction and reduce muddying. The project is in compliance with the Executive Order.

7.8 Farmland Protection Policy Act, 1981 (Public Law 97-98). No prime or unique farmland or farmland of statewide importance would be impacted by project, nor will there be an impact on grazing land.

7.9 Arizona Environmental Quality Act. In compliance with Arizona Environmental Quality Act of 1986, the COE coordinated the proposed project with the Arizona Department of Environmental Quality.

7.10 Executive Order 11988, Floodplain Management. This Executive Order requires that before taking an action, agencies shall determine whether the proposed action will occur in a floodplain. Informal coordination with Cochise County Planning Department determined that no area of the project was in a floodplain.

7.11 Arizona Native Plant Law. The law requires that the Arizona Department of Agriculture be notified 60 days prior to the removal of any state-protected plant. The DEA for this project will be provided to the Department of Agriculture as a notice of intent to remove protected plant species in the project area. Any plants relocated outside the project boundaries must be accompanied by a permit from the Department of Agriculture. The state-protected plants likely to be affected by this project are honey mesquites. Any plants relocated would be relocated within the project boundaries, and would not require a permit.

R 7.12 Arizona Executive Order No. 91-6. This order concerns Protection of Riparian Areas, and specifically tasks Arizona Department of Environmental Quality (ADEQ) to "consider the protection of riparian areas in its decision making regarding certification, conditioning or denial of water quality certifications under Section 401 of the Federal Clean Water Act,...". This document's 401 certification was coordinated with ADEQ staff, see Section 6.1.

R 7.13 Arizona Executive Order No. 89-16. This order deals with Streams and Riparian Resources, which tasks State agencies to "determine whether current and proposed policies, actions, requirements, and funding impact on stream and riparian resources...". The proposed project has been coordinated with several State agencies, including Arizona Game and Fish Department, Arizona Department of Agriculture, Arizona Department of Environmental Quality, Arizona State Land Department, Arizona Department of Water Resources, Arizona Department of Transportation and the Arizona Department of Health Services. All comments received from these agencies have been addressed in this final EA.

8.0 ENVIRONMENTAL COMMITMENTS

R 8.1 Construction will not begin prior to:
Marking, by qualified biologist, of sensitive individual plants/areas
Marking, by qualified archaeologist, of cultural resource areas and
Signing of the Finding of No Significant Impact (FONSI) by JTF-6.

8.2 The proposed project will not impact monuments located along the United States - Mexico border. The staging area will not be selected in the areas near the International Boundary.

8.3 Potentially significant cultural resource sites are delineated in the plans and specifications and will be avoided.

8.4 Appropriate control techniques will be utilized during construction along the washes to minimize turbidity.

8.5 A watering program will be employed during the construction to minimize fugitive dust; the water will be obtained from the City of Douglas water supply and will be free of contaminants.

R 8.6 Clean material will be used to construct structures; no polluted silts or other material will be placed in the washes; construction debris and rock will be removed upon completion of the project.

R 8.7 Construction debris in washes adjacent to project roads will be removed.

8.8 During construction, additional rocks, debris, oil and grease will be cleaned up.

8.9 Roads will be maintained and upgraded where they presently lay, except where environmental constraints recommend modification or movement of roads.

R 8.10 Roads will be maintained and upgraded to their current width. In areas where the road is too narrow to allow certain activities, theses activities will be restricted to designated areas only. These activities include; any vehicle passage, head-on passage of two vehicles, loading/unloading, or turning around.

8.11 A qualified biologist familiar with the Environmental Assessment, including environmental commitments and mitigation, shall be present at all critical times during mobilization, construction, and demobilization to monitor the project.

8.12 The Arizona Department of Agriculture shall be allowed to salvage any protected native plants that cannot be avoided. If possible, salvaged agaves will be relocated in safe area adjacent to the project site.

R 8.13 If the original construction schedule is revised and work continues past April 9, 1993, JTF-6 will notify the appropriate resource agencies.

R 8.14 Waste or construction material will not be piled in areas near the international boundary.

R 8.15 No fence or road work will take place any closer than two feet north of the boundary to avoid any accident of encroachment into Mexico.

R 8.16 When this project is physically commenced at the construction site, ADEQ must be notified within seven days of the start date. When this notification is made, please provide the start date and the name of a contact person to be on site. When the project is complete ADEQ must be similarly notified. Notification must be addressed to Melinda Longsworth at ADEQ, 400 West Congress St., Ste 433, Tucson, AZ 85701 (602)-628-6740.

R 8.17 COE will notify Arizona State Lands Department, Environmental Resources and Trespass Section (ERTS) within 24 hours (emergency situation) or within 30 days (non-emergency) of any environmental noncompliance or cultural resource discovery. Contact is William Dowdle, Manager, ERTS, 1616 W. Adams, Phoenix Az 85007 (602)-542-3106.

R 8.18 In order to control air quality in the area; the following actions will be used;

While preparing the site:
minimize land disturbance, use water trucks to minimize dust and limit vehicular paths.

While completing the project:
water traveled unpaved roads, minimize unnecessary vehicular/machinery activities and minimize dirt track-out by cleaning trucks before leaving the project site.

While terminating the project:
remove unused material, and remove dirt piles.

9.0 LIST OF PREPARERS AND REVIEWERS.

9.1 This Draft EA was prepared by the U.S. Army Corps of Engineers, Los Angeles District, Environmental Design Section.

Name	Role in Preparing Document
	(COE)
D.E. Gene Seagle, Geographer	Environmental Coordinator Draft/Final EA Preparation
Steve Dibble, Senior Archeologist	Cultural Resources Survey and Preparation
Lois Goodman, Ecologist	Biological Resources Survey and Preparation
Joy Jaiswal, Environmental Protection Specialist	Project Manager Review, Draft/Final EA
Laura Tschudi, Chief, Environmental Design Section	Review, Draft/Final EA
	(Others)
LTC Deharde, Staff Engineer Joint Task Force Six	Review, Draft/Final EA
Major Stafford, 864th Engineering Battalion Ft. Lewis, Washington	Review, Draft/Final EA
Dwayne Hudson, U.S. Border Patrol Station Douglas, Arizona	Review, Draft EA

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Stebbins, R. C., 1966. A field Guide to Western Reptiles and Amphibians. Houghton Mifflin Company, Boston. 279 pp.

U.S. Army, Corps of Engineers, 1991. Environmental Assessment for Joint Task Force Six Operation 23-90, Nogales, Santa Cruz County, Arizona. 1991

U.S. Fish and Wildlife Service, Region 2, 1982. Endangered species of Arizona and New Mexico. 72 pp.

Table 1. Plant Species Identified in the Project Area

Acacia constricta	white-thorn acacia
Agave palmeri	Palmer's agave
Ambrosia sp.	ragweed
Aristida sp.	three-awn grass
Atriplex canescens	four-wing saltbush
Baccharis sarothroides	desert broom
Bouteloua curtipendula	side oats grama
B. gracilis	blue grama
Calliandra eriophylla	Fairy Duster
Chilopsis linearis	desert-willow
Chrysothamnus sp.	rabbitbrush
Condalia lycioides	gray thorn
Cynodon dactylon	Bermuda grass
Dasylirion wheeleri	sotol
Datura sp.	thornapple
Ephedra trifurca	Mormon tea
Eragrostis lehmanniana	Lehmann's lovegrass
Eriogonum sp.	buckwheat
Flourensia cernua	tarbush
Fouquieria splendens	ocotillo
Gnaphalium sp.	cudweed
Gutierrezia sp.	snakeweed
Helianthus annus	common sunflower
Koberlinia spinosa	all-thorn
Larrea tridentata	creosote bush
Lepidium sp.	peppergrass
Leptochloa sp.	sprangletop grass
Lycium sp.	desert-thorn
Opuntia sp.	prickly pear
Opuntia spinosior	cane cholla
Opuntia violacea	purple prickly pear
Petalonyx thurberi	sandpaper plant
Polypogon monspeliensis	rabbit-foot grass
Prosopis julifora var. velutine	Velvet Mesquite
Prosopis velutina	velvet mesquite
Rhus microphylla	little-leaf sumac
Sailx goodingii	Gooding willow
Salsola iberica	Russian thistle
Scirpus sp.	bulrush
Senecio sp.	groundsel
Sorghum halepense	Johnson grass
Solanum eleagnifolium	silverleaf horsenettle (nightshade)
Sporobolus airoides	Alkali Sacaton
Sporobolis wrightii	sacaton
Typha latifolia	common cattail
Tamarix pentandra	salt cedar
Yucca baccata	banana yucca
Yucca elata	soaptree yucca
Xanthium strumarium	cocklebur
Zinnia sp.	desert zinnia

Table 2.

Additional Mammal Species
Potentially Found in the Project Site

California Leaf-Nosed Bat (Macrotus californicus)
Long-tongued bat (Choeronycteris mexicana) (Summer Only)
Sanborn's Long-Nosed Bat (Leptonycteris sanborni) (Summer Only)
Cave Myotis (Myotis velifer velifer) (Winter Range)
Fringed Myotis (Myotis thysanodes thysanodes) (Winter Range)
Long-legged Myotis (Myotis volans interior)
California Myotis (Myotis californicus californicus) (Winter Range)
Small-footed Myotis (Myotis leibii melanorhinus)
Southern Yellow Bat (Lasiurus ega xanthinus)
Townsend's Big-Eared Bat (Plecotus townsendii)
Pallid Bat (Antrozous pallidus pallidus) (Winter Range)
American Free-tailed Bat (Tadarida brasiliensis mexicana) (Winter Range)
Pocketed Free-tailed Bat (Tadarida femorosacca)
Eastern Cottontail (Sylvilagus floridanus holzneri)
Desert Cottontail (Sylvilagus audubonii minor)
Cliff Chipmunk (Eutamias dorsalis dorsalis)
Harris' Antelope Squirrel (Ammospermophilus harrisii)
Rock Squirrel (Spermophilus variegatus grammurus)
Spotted Ground Squirrel (Spermophilus spilosoma canescens)
Round-tailed Ground Squirrel (Spermophilus tereticaudus neglectus)
Gunnison's Prairie Dog (Cynomys gunnisoni zuniensis)
Botta's Pocket Gopher (Thomomys bottae mearnsi)
Southern Pocket Gopher (Thomomys umbrinus intermedius)
Silky Pocket Mouse (Perognathus flavus flavus)
Rock Pocket Mouse (Perognathus intermedius intermedius)
Desert Pocket Mouse (Perognathus penicillatus penicillatus)
Hispid Pocket Mouse (Perognathus hispidus conditi)
Ord's Kangaroo Rat (Dipodomys ordii ordii)
Banner-tailed Kangaroo Rat (Dipodomys spectabilis spectabilis)
Merriam's Kangaroo Rat (Dipodomys merriami olivaceus)
Western Harvest Mouse (Reithrodontomys megalotis megalotis)
Fulvous Harvest Mouse (Reithrodontomys fulvescens fulvescens)
Cactus Mouse (Peromyscus eremicus eremicus)
Deer Mouse (Peromyscus maniculatus sonoriensis)
White-footed Mouse (Peromyscus leucopus arizonae)
Brush Mouse (Peromyscus boylii rowleyi)
Northern Grasshopper Mouse (Onychomys leucogaster ruidosae)
Southern Grasshopper Mouse (Onychomys torridus torridus)
Arizona Cotton Rat (Sigmodon arizonae cienegae)
Fulvous Cotton Rat (Sigmodon fulviventer minimus)
Yellow-nosed Cotton Rat (Sigmodon ochrognathus)
White-throated Wood Rat (Neotoma albigula albigula)
Kit Fox (Vulpes macrotis neomexicana)
Western Spotted Skunk (Spilogale gracilis leucoparia)
Striped Skunk (Mephitis mephitis estor)
Hooded Skunk (Mephitis macroura milleri)
Hog-nosed Skunk (Conepatus mesoleucus venaticus)
Bobcat (Felis rufus baileyi)
White-tailed Deer (Odocoileus virginianus couesi)
Mule Deer (Odocoileus hemionus crooki)

Table 3. Draft EA Mailing List

The following agencies and departments were provided copies of the Draft EA for comment.

EDWIN K. SWANSON, P.E.
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER ASSESSMENT SECTION
P.O. BOX 600
PHOENIX AZ 85001-0600

R U.S. ENVIRONMENTAL PROTECTION AGENCY,
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO CA 94105

JODY KLEIN, DIRECTOR
COCHISE COUNTY PLANNING DEPARTMENT
619 MELODY LANE
BISBEE AZ 85603

FRANK AMARILLAS, PORT DIRECTOR
1ST AND PAN AMERICAN BOULEVARD
DOUGLAS AZ 85607

DAVID CREIGHTON,
ARIZONA DEPARTMENT OF WATER RESOURCES
15 S 15TH AVE
PHOENIX AZ 85007

STEVE HILDRETH,
ENVIRONMENTAL SECTION,
ARIZONA STATE LANDS DEPARTMENT
1616 W ADAMS
PHOENIX AZ 85007

BILL FISH, RIGHT OF WAY SECTION
ARIZONA STATE LANDS DEPARTMENT
1616 W ADAMS
PHOENIX AZ 85007

ANDRA JUNIEL, PLANNER
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY,
AIR QUALITY
3033 N CENTRAL AVE
PHOENIX AZ 85012

DON SHROYER,
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY,
NON-POINT PROGRAM
3033 N CENTRAL AVE
PHOENIX AZ 85012

MARY RICHARDSON
US FISH AND WILDLIFE SERVICE
PHOENIX FIELD OFFICE
3616 W. THOMAS ROAD SUITE 6
PHOENIX AZ 85019

JOHN SALEM
AZ DEPARTMENT OF AGRICULTURE
P.O. BOX 1168
DOUGLAS AZ 85608

RICK GERHARDT
AZ GAME AND FISH DEPARTMENT
555 NORTH GREASEWOOD ROAD
TUCSON AZ 85745-3612

ROBERT MARTIN,
CITY BUILDING, OFFICE 10
425 10TH STREET
DOUGLAS AZ 85607

ROBERT DUMMER, BIOLOGIST,
USACOE REGULATORY UNIT
3636 N. CENTRAL AVE STE 760
PHOENIX AZ 85012-1936

DAVID YETMAN
EXEC. DIRECTOR, AUDUBON SOCIETY,
TUCSON CHAPTER
300 E UNIVERSITY STE 120
TUCSON AZ 85705

MIKE DAWSON, PROJECT COORDINATOR
ENVIRONMENTAL PLANNING SECTION
ARIZONA DEPARTMENT OF TRANSPORTATION
205 S 17TH AVE
PHOENIX AZ 85007

ATTN: MAJOR STAFFORD
S-3, 864TH ENG BATTALION
FT LEWIS WA 98433

TOM GOSSET/DWAYNE HUDSON,
US BORDER PATROL STATION
P.O. BOX 1175
DOUGLAS AZ 85607

DARLENE HAEGELE,
BLM, SAFFORD DISTRICT
425 EAST 4TH STREET
SAFFORD AZ 85546

BOB ARCHIBALD,
BLM, AZ STATE OFFICE
P.O. BOX 16563
PHOENIX AZ 85011

ATTN: REFERENCE DESK
DOUGLAS PUBLIC LIBRARY
625 10TH STREET
DOUGLAS AZ 85607

ATTN: CATHERIN LINCER, DIRECTOR
COCHISE COUNTY COMMUNITY
COLLEGE LIBRARY
4190 WEST HIGHWAY 80
DOUGLAS AZ 85607

MS. JANICE DUNN
MANAGER, ARIZONA DEPARTMENT OF COMMERCE
ARIZONA STATE CLEARINGHOUSE
3800 NORTH CENTRAL, SUITE 1400
PHOENIX AZ 85012

FIGURES

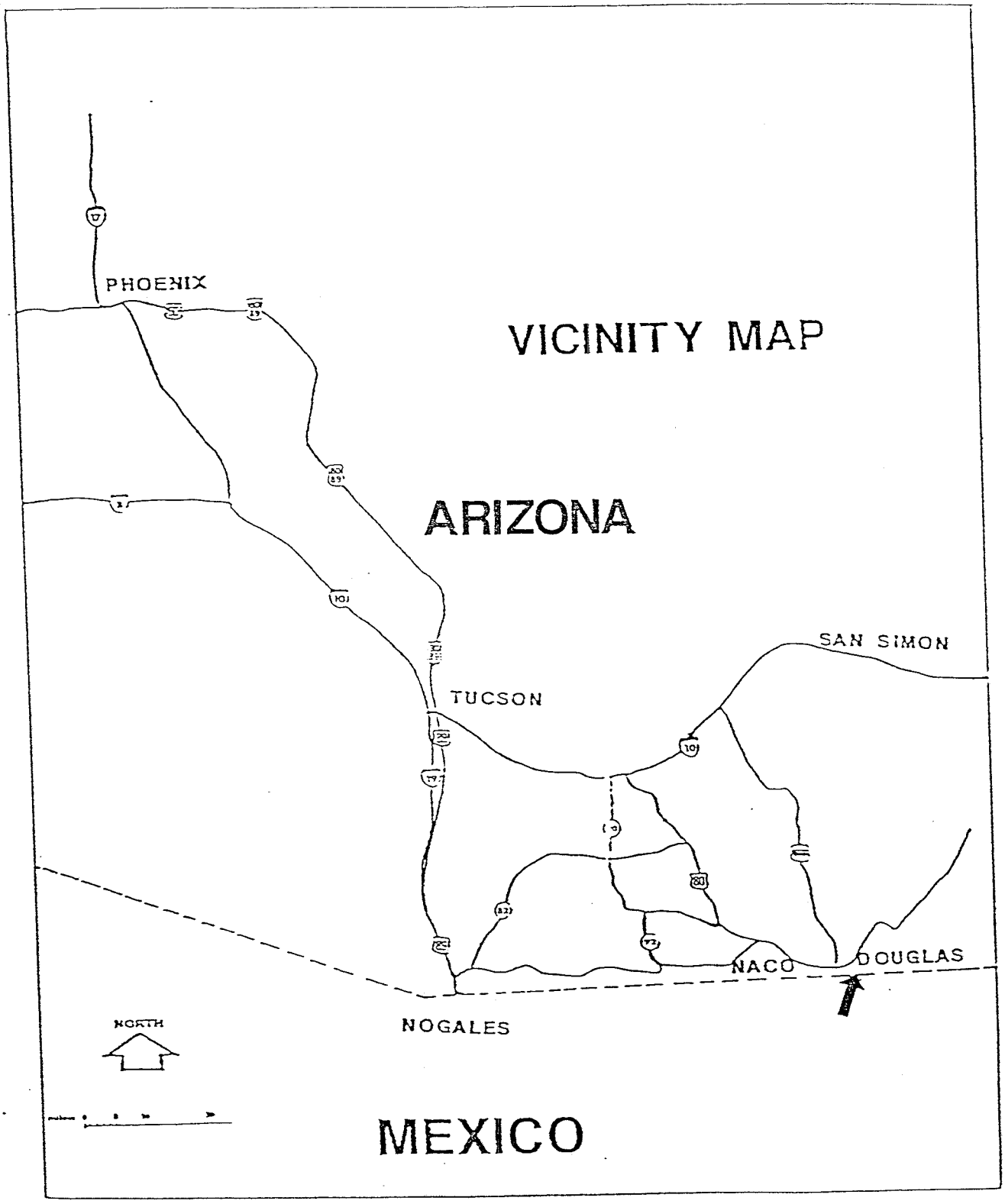


FIGURE 1. VICINITY MAP

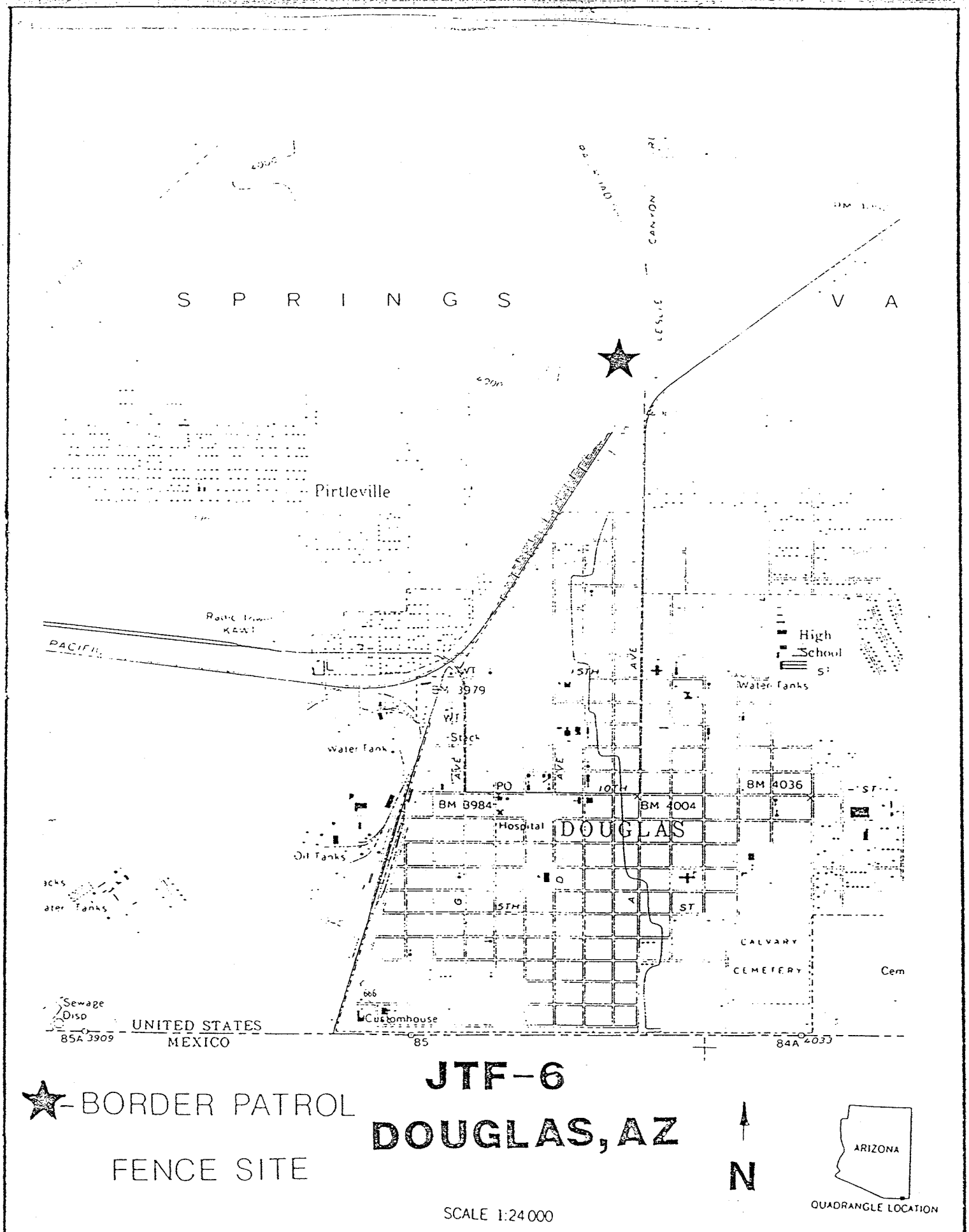
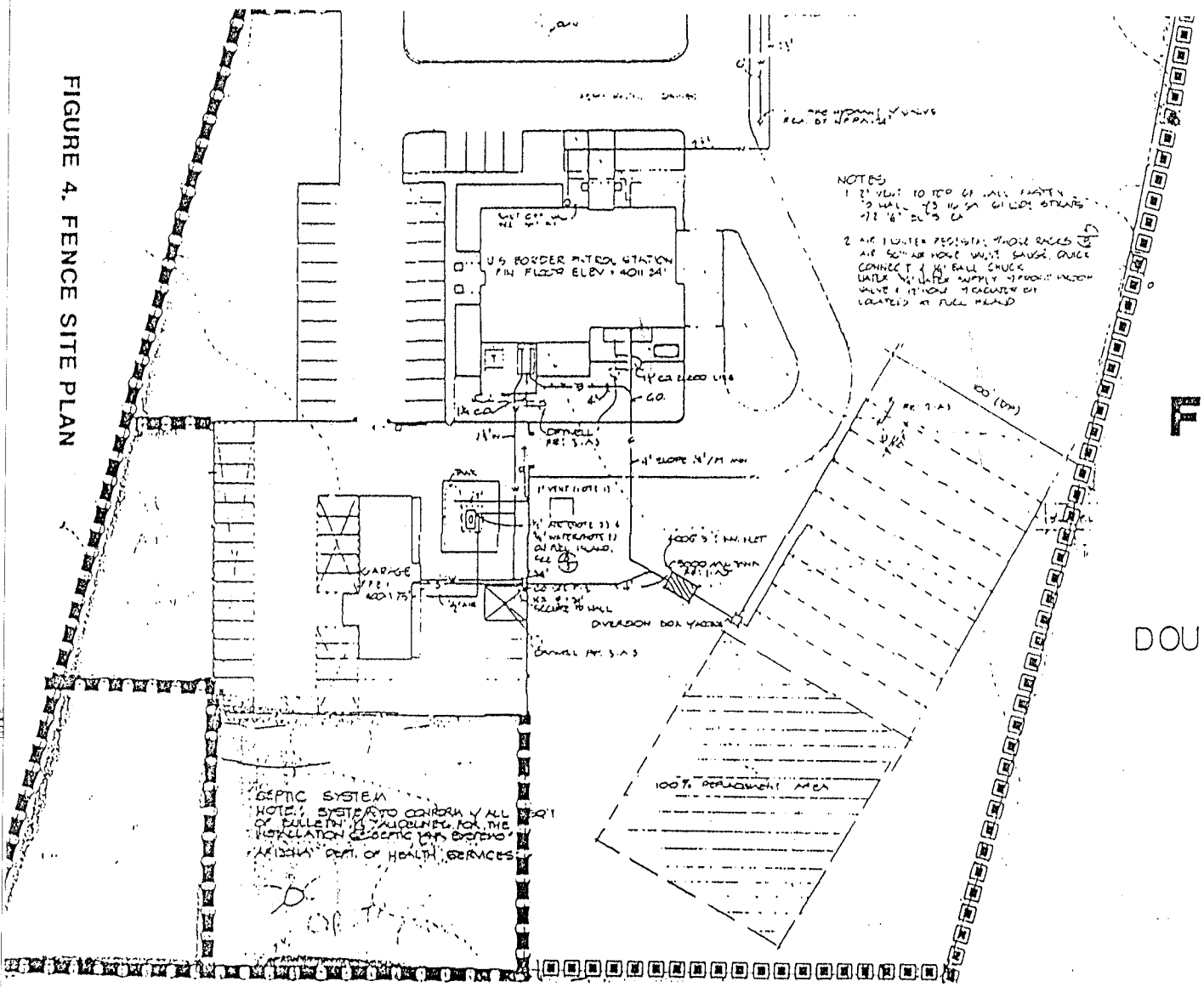


FIGURE 3. FENCE SITE LOCATION

FIGURE 4. FENCE SITE PLAN



DOUGLAS JTF-6

FENCE SITE PLAN

DOUGLAS BORDER PATROL STATION

N

■■■■■■ = CHAIN-LIMK FENCE

▣▣▣▣▣▣▣ = BARBED WIRE FENCE

····· = SPLIT-RAIL FENCE

APPENDICES

APPENDIX A

AGENCY COORDINATION

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

December 4, 1992

REPLY TO
ATTENTION OF

Office of the Chief
Environmental Resources Branch

Mr. Sam F. Spiller
Field Supervisor
U.S. Fish and Wildlife Service
3616 W. Thomas, Suite 6
Phoenix, Arizona 85019

Dear Mr. Spiller:

Please provide current lists of any endangered, threatened, proposed, or candidate species, pursuant to the Endangered Species Act of 1973, that may be affected by the proposed Joint Task Force Six (JTF-6) Operation-92/93 projects in Arizona.

The overall JTF-6 Operation-92/93 will cover five project sites along or near the border of the United States and Mexico. The projects are located in Arizona in the vicinity of Nogales, Douglas, Naco, Sasabe, and the Quijotoa Mountains. Projects will include road maintenance, road improvements, and fence construction. Detailed project descriptions and maps are enclosed for each project (enclosures 1 to 5).

Please respond to this species list request within thirty (30) days of receipt of this letter. We will require a separate list for each project. Should you require additional information or have any questions, please contact Ms. Lois Goodman at (213) 894-0535 for the Douglas and Naco projects or Dr. Emily Carter at (213) 894-5082 for the Nogales, Sasabe, and Quijotoa Mountains projects.

Thank you for your assistance in this matter.

Sincerely,

Robert S. Joe
Chief, Planning Division

Enclosures

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

December 7, 1992

REPLY TO
ATTENTION OF

Office of the Chief
Environmental Resources Branch

Mr. Fenton Kay
Heritage Management System Manager
Arizona Department of Game and Fish
2221 West Greenway Road
Phoenix, Arizona 85023

Dear Mr. Kay:

Please provide current lists of species or other biological resources of concern to the Arizona Game and Fish Department that may be affected by the proposed Joint Task Force Six (JTF-6) Operation-92/93 projects in Arizona.

The overall JTF-6 Operation-92/93 will cover five project sites along or near the border of the United States and Mexico. The projects are located in Arizona in the vicinity of Nogales, Douglas, Naco, Sasabe, and the Quijotoa Mountains. Projects will include road maintenance, road improvements, and fence construction. Detailed project descriptions and maps are enclosed for each project (enclosures 1 to 5).

Please respond to this request for information at your earliest possible convenience. We will require a separate list for each project. Should you require additional information or have any questions, please contact Ms. Lois Goodman at (213) 894-0535 for the Douglas and Naco projects or Dr. Emily Carter at (213) 894-5082 for the Nogales, Sasabe, and Quijotoa Mountains projects.

Thank you for your assistance in this matter.

Sincerely,

Robert S. Joe
Chief, Planning Division

Enclosures

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

December 23, 1992

REPLY TO
ATTENTION OF:

Office of the Chief
Environmental Resources Branch

Mr. James Garrison
Arizona State Parks
State Historic Preservation Officer
800 West Washington, Suite 415
Phoenix, Arizona 85007

Dear Mr. Garrison:

The Los Angeles District, Corps of Engineers (COE), is preparing an Environmental Assessment (EA) for road maintenance and fence installation for the Joint Task Force Six (JTF-6) project in Douglas (enclosure 1). Project impacts will be limited to providing routine, minor maintenance to 24 miles of the existing "drag" road and 1 mile of existing mountain road, and installation of fences at the U.S. Border Patrol Station. Maintenance involves occasional minor smoothing of intermittent areas of the road within the extant road footprint. The total amount of impacts are expected to be restricted to about 2 acres for the drag roads, 1.2 acres for the mountain road, and .8 for culverts and cattle guard refootings. The area of potential effects (APE) is located along the international border in and near the Town of Douglas, Cochise County. The drag roads are located both east and west of Douglas, and the mountain road is approximately eight miles east of Douglas. The Border Patrol Station is about one mile north of Douglas. The APE also includes the original bivouac and equipment staging areas that were utilized for the road construction in 1991.

The APE has been previously surveyed by Geo-Marine, Inc., under contract to Fort Worth District, COE. The draft report entitled "Cultural resources monitoring survey of the Douglas-Naco, Arizona sector of the U.S.-Mexican border" (G-M) was completed in February, 1992 and been reviewed by your office. Geo-Marine's survey identified 21 cultural resources (G-M, Table 3). COE staff archeologists made a followup field visit to the locale in November and December, 1992. The purpose of the COE visit was to conduct a reconnaissance survey of 1½ miles of road improvement to the mountain road. The terrain in this area was very steep, with low potential for cultural resources, and no sites were found (enclosure 2).

A review of the cultural resources G-M found indicated that all were located outside the APE for the current road maintenance project. Inasmuch as the project is designed to restrict traffic to the roadway, impacts will not occur as a result of conducting minor maintenance to the roads. That coupled with the fact that the reconnaissance

survey of the mountain road was negative has led the COE to the conclusion that the project will not impact cultural resources. In addition, the project will be monitored by a COE archeologist to ensure that no previously identified resource will be impacted. Construction crews will be briefed on the requirement that they stay within previously determined project boundaries. Therefore, COE has determined that the JTF-6 road maintenance project as planned will not involve properties that are listed in or are eligible for the National Register of Historic Places.

We request that you review the enclosed information. If you agree with this determination, we would appreciate your concurrence. If you have any questions regarding this project or the determination, please contact Mr. Richard Perry, Project Archeologist, at (213) 894-6087.

Sincerely,

Charles E. Wahrman

FOR: Robert S. Joe
Chief, Planning Division

Enclosure

CONCUR

for ARIZONA STATE HISTORIC PRESERVATION OFFICER
ARIZONA STATE PARKS BOARD 1/10/93

DEPARTMENT OF DEFENSE
JOINT TASK FORCE SIX
FORT BLISS, TEXAS 79916-0058

January 27, 1993

REPLY TO
ATTENTION OF

Staff Engineer

Mr. Conrad G. Keyes
International Boundary and Water Commission
4171 North Mesa, Suite C-310
El Paso, Texas 79902

Dear Mr. Keyes:

Thank you for your letters of January 15, 1993 responding to draft Environmental Assessments in San Diego, California and Southern Arizona.

The purpose of this letter is to inform you of our intent to start construction of the various projects outlined in the Environmental Assessments as outlined below:

PROJECT	CONSTRUCTING UNIT	PERSONNEL	EQUIPMENT	DATE
Naco, Cochise County, AZ Road Construction	B Company 864 Engr Bn	80	Motor graders, dozers, scrapers, dump trucks, vibratory compactors	8 Feb 93
Douglas, Cochise County, AZ Road Construction	B Company 864 Engr Bn	80	Motor graders, dozers, scrapers, dump trucks, vibratory compactors	8 Feb 93
San Diego, California Fence Construction	63rd ARCOM Task Force Steel Ribbon	50	Dozer, auger, crane, flat bed cargo truck, portable welders	16 Feb 93

Response to specific concerns raised in your letter about work on the border follows:

It is Joint Task Force Six policy that no service member enter Mexico for any reason, whether work related or on leisure time. Extreme care will be taken to ensure that no spoil material, construction material, or equipment will encroach on Mexican territory.

We are aware of your concerns about intervisibility of the boundary monuments, and plan all fence alignments to allow for this intervisibility.

The road improvement work should not alter drainage patterns in any way, as the existing road alignment and grade will be maintained. Culvert work and drainage improvement is intended to prevent further erosion, not divert drainage patterns.

My staff engineer has worked closely with your engineer section concerning designs of the fence section and "flood gate" in Smuggler's Gulch. It is our understanding that your engineers have approved the design and provided a desirable alignment of the fence in the Smuggler arroyo that avoids the large sewage pipe. We intend to incorporate that design and alignment in our construction plan. Access gates will be provided.

Design of drainage structures in Goat Canyon where intermittent washes are encountered is depicted in the enclosed drawing. The precise alignment of the fence fluctuates so as not to impact on critical habitat. The fence in Goat Canyon will be approximately 20 meters from the international boundary.

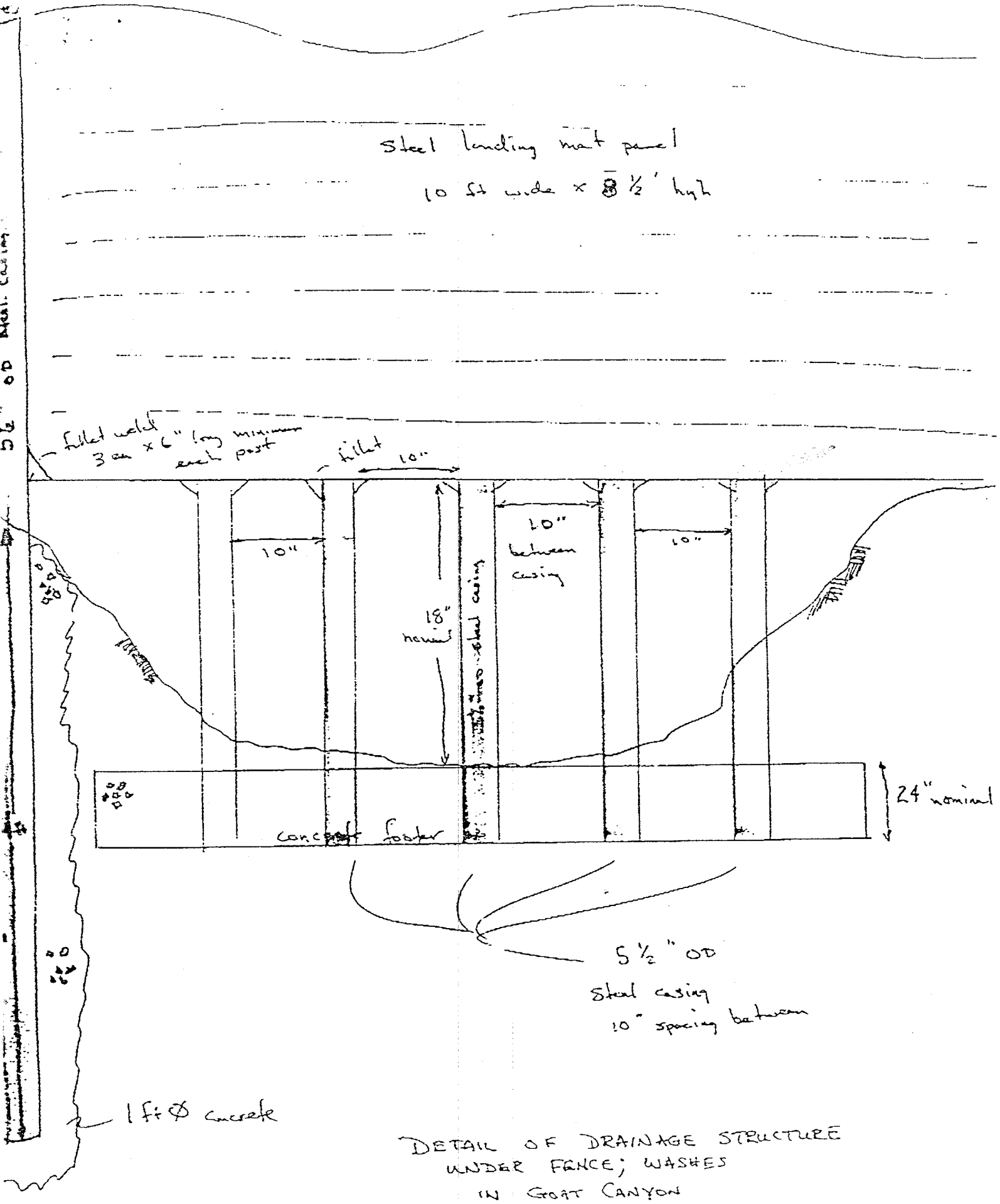
Thank you for your continued cooperation.

Joint Task Force Six - "Service to the Nation."

Sincerely,

Terry L. Thompson
Colonel, U.S. Air Force
Chief of Staff

Enclosure



DETAIL OF DRAINAGE STRUCTURE
UNDER FENCE; WASHES
IN GOAT CANYON

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
ARIZONA ECOLOGICAL SERVICES FIELD OFFICE
3616 West Thomas Road, Suite 6
Phoenix, Arizona 85019

Telephone: (602) 379-4720 FAX: (602) 379-6629

2-21-93-I-027

January 6, 1993

Robert S. Joe
Office of the Chief
Environmental Resources Branch
Department of the Army
Los Angeles District, Corps of Engineers
P.O. Box 2711
Los Angeles, California 90053-2325

Dear Mr. Joe:

This letter is in response to your December 4, 1992, request for lists of endangered, threatened, or other species of special concern in the vicinity of JTF-6 Operation-92/93 projects in Arizona.

Federal endangered and candidate species which may be found in the vicinity of projects include:

DOUGLAS AREA:

Endangered Species
Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae)

Threatened Species
Cochise pincushion cactus (Coryphantha robbinsorum)

Category 1 Species
Southwestern willow flycatcher (Empidonax traillii extimus)
Cactus ferruginous pygmy owl (Glaucidium brasilianum cactorum)

Category 2 Species
Reptiles
Canyon spotted whiptail (Cnemidophorus burti)
Texas horned lizard (Phrynosoma cornutum)
Mexican garter snake (Thamnophis eques)

Amphibians
Lowland leopard frog (Rana yavapaiensis)
Chiricahua leopard frog (Rana chiricahuensis

Plants
Playa Spider Flower (Cleome multicaulis)
Needle-spined pineapple cactus (Echinomastus erectocentrus var. erectocentrus)
Huachuca golden-aster (Heterotheca rutteri)
Limestone Arizona rosewood (Vauquelinia californica ssp. pauciflora)
Cynanchum wigginsii
Pectis imberbis

Mammals
California leaf-nosed bat (Macrotus californicus)
Mexican long-tongued bat (Choeronycteris mexicana)
Southwestern cave bat (Myotis velifer brevis)

NACO AREA:

Endangered Species
Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae)

Category 1 Species
Southwestern willow flycatcher (Empidonax traillii extimus)
Cactus ferruginous pygmy owl (Glaucidium brasilianum cactorum)
Acuna Cactus (Echinomastrus erectocentrus var. acunensis)

Category 2 Species
Reptiles
Canyon spotted whiptail (Cnemidophorus burti)
Texas horned lizard (Phrynosoma cornutum)
Mexican garter snake (Thamnophis eques)

Amphibians
Lowland leopard frog (Rana yavapaiensis)
Chiricahua leopard frog (Rana chiricahuensis)

Plants
Cynanchum wigginsii

Mammals
California leaf-nosed bat (Macrotus californicus)
Mexican long-tongued bat (Choeronycteris mexicana)
Southwestern cave bat (Myotis velifer brevis)
Arizona shrew (Sorex arizonae)

SASABE/QUIJOTOA MTN AREA:
Endangered Species
Lesser long-nosed bat (Leptonycteris curasoae yerbabuenae)
Kearney's blue star (Ansonia kearneyana)
Tumamoc globeberry (Tumamoca macdougalii)

Proposed Endangered
Pima pineapple cactus (Coryphantha scheeri var. robustispina)

Category 1 Species
Southwestern willow flycatcher (Empidonax traillii extimus)
Cactus ferruginous pygmy owl (Glaucidium brasilianum cactorum)
Catalina beardtongue (Penstemon discolor)
Gentry indigo bush (Dalea tentaculcides)

Category 2 Species

Reptiles

Canyon spotted whiptail (Cnemidophorus burti)
Texas horned lizard (Phrynosoma cornutum)
Mexican garter snake (Thamnophis eques)
Chuckwalla (Sauromalus obesus)
Sonoran Desert tortoise (Gopherus agassizii)

Amphibians

Lowland leopard frog (Rana yavapaiensis)
Chiricahua leopard frog (Rana chiricahuensis)

Plants

Saiya (Amoreuxia gonzalezii)
Santa Cruz star leaf (Choisya mollis)
Cynanchum wigginsii
Huachuca golden-aster (Heterotheca rutteri)
Pectis imberbis
Phaesolus supinus

Mammals

California leaf-nosed bat (Macrotus californicus)
Mexican long-tongued bat (Choeronycteris mexicana)
Southwestern cave bat (Myotis velifer brevis)
Underwood's mastiff bat (Eumops underwoodi sonoriensis)

Endangered and threatened species must be considered in the development of projects. Candidate species are those which may in the future be considered for listing as endangered or threatened species. Category 1 candidates are those for which the Fish and Wildlife Service has substantial information to support proposing to list the species as endangered or threatened. Category 2 candidates are those for which such information is not available and for which we are seeking conclusive data on biological vulnerability and threats. Although candidate species have no legal protection, we would appreciate your consideration of them in the development of the projects.

Please note that the Arizona Game and Fish Department may know of species in the area that are State-listed or that are of management concern.

In future communications on this project, please refer to consultation number 2-21-93-I-027. If we may be of further assistance, please contact Lorena Wada or me.

Sincerely,

Sam F. Spiller

Sam F. Spiller
Field Supervisor

cc: Director, Arizona Game and Fish Department, Phoenix, Arizona

THE STATE OF ARIZONA

GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000

Governor
Fife Symington

Commissioners:
Gordon K. Whiting, Central, Chairman
Larry Taylor, Yuma
Elizabeth T. Woodin, Tucson
Arthur Porter, Phoenix
Nonie Johnson, Snowflake

Director
Duane L. Shroufe

Deputy Director
Thomas W. Spalding

December 22, 1992

Mr. Robert S. Joe
Corps of Engineers
Los Angeles District
P.O. Box 2711
Los Angeles, California 90053-2325

Dear Mr. Joe:

Re: Special Status Species; Joint Task Force Six, Road Maintenance and Fencing, Douglas, Arizona

The Arizona Game and Fish Department (Department) has reviewed your letter of December 7, 1992, regarding the presence of special status species in the vicinity of Douglas, Arizona, and the following information is provided.

The Department's Heritage Data Management System has been accessed and current records do not indicate the presence of any Endangered, Threatened or other special status species in the project vicinity.

Thank you for the opportunity to provide this information. If you have any questions please contact me at (602) 789-3605.

Sincerely,

Nancy Olson

Nancy Olson
Project Evaluation Specialist
Habitat Branch

NLO:no

cc: Gerry Perry, Regional Supervisor, Region V, Tucson

APPENDIX B

WQMS-301.030
APPLICANTS RESPONSE TO ARIZONA WATER QUALITY CONTROL COUNCIL POLICY FOR CONSTRUCTION AND RELATED ACTIVITIES IN WATER,
ADOPTED APRIL 13, 1977
REVISED JANUARY 3, 1990
AND
SECTION 404(b)(1) WATER QUALITY EVALUATION
(CLEAN WATER ACT)

WQMS - 301.030
APPLICANTS RESPONSE TO ARIZONA WATER QUALITY CONTROL COUNCIL POLICY FOR CONSTRUCTION AND RELATED ACTIVITIES IN WATER, ADOPTED APRIL 13 1977 REVISED JANUARY 3, 1990

For each policy, please describe the procedures, practices and/or facilities that will (a) minimize potential pollution of surface waters and (b) demonstrate compliance with the State water quality standards (A.A.C. Title 18, Chapter 11, Articles 1, 2, and 3). Please note the waters of the State include all watercourses, and perennial or intermittent streams (A.R.S. 49-201.31).

Policy (1) Provision for temporary pollution control measures including dikes, basins, ditches and application of straw and seed.

At present, and during most of the year, all washes but one are inactive and dry. Only Whitewater wash is perennial. Normal rainfall is 13 to 16 inches per year. In the event of flooding, construction will be stopped until the washes are dry. Further, care will be taken to ensure that no construction silt, debris or other potentially polluting materials are deposited in the washes. In addition, the following prevention measures will be used: clean material will be used to construct structures; debris and rock will be removed upon completion of the project; refueling and emergency repair areas will be located well away from washes; spills will be reported immediately, contained by earthen dikes or sand bags and remedied immediately; and debris that has polluted washes within the project area will be cleaned up by military personnel.

Policy (2) Erosion control measures including minimizing clearing and grubbing and limiting exposure of erodible surface to 750,000 square feet for each location.

Minimum vegetation will be disturbed while maintaining the road. No grubbing or clearing is planned.

Policy (3) Construction of footings in water by sheet pile cofferdam method and pumping water from within the dam to settling ponds before returning it to the water.

Policy (3) is not applicable to this project.

Policy (4) Isolation of the construction area by sand dikes.

Policy (4) is not applicable to this project. However, if any type of toxic material spill occurs, it will be

reported, contained by earthen dikes or sand bags and remedied immediately.

Policy (5) Erection of barriers, covers, shields and other protective devices as necessary to prevent any construction materials, equipment or contaminants from falling or being thrown into the water.

Prevention measures are discussed in Policy (1). This policy not applicable to this project.

Policy (6)Construction of drainage facilities to control erosion and sedimentation.

Corregated steel pipe culverts will be used; they will be compacted within the washes to prevent excessive erosion or ponding. A portion of the maintenance on the west side of Douglas includes the repair of existing check dams, which are functioning but need damage from vandalism repaired.

Policy (7) Provision of an adequate means, such as a bypass channel, to carry a stream free from mud and silt around operations to remove material from beneath a flowing stream.

Placement of structures will occur while washes are inactive and dry; no materials will be remove from flowing stream channels. Therefore, this policy is not applicable.

Policy (8) A requirement for transportation of materials across live streams to be conducted without muddying the stream. Mechanized equipment should not be operated in stream channels of live streams except as may be necessary to construct crossings or barriers and fills at channel changes.

This Policy is applicable to the one live streambed in this project. The streambed, at Whitewater wash, will have maintenance performed on the slope to the stream, (light blading of the roadway) and clean fill (large gravel) will be placed in the streambed to prevent muddying and increase passability for the maintenance operation and future use.

Policy (9) A requirement for wash water from aggregate washing or other operations containing mud or silt to be treated by filtration or retention in a settling pond, or ponds, adequate to prevent muddy water from entering live streams.

Policy (3) is not applicable to this project, as no aggregate will be washed.

Policy (10) A requirement for oily or greasy substances originating from the contractor's operations not be placed where they will enter a live stream.

Construction equipment will be maintained to ensure that no significant amounts of oils or greases are allowed to contaminate the construction site. Personnel will immediately clean and dispose of any oils or greases accidently spilled. Other prevention measures are discussed in Policy (1).

Policy (11) Provisions for Portland Cement or fresh Portland cement concrete not to be allowed to enter flowing water of streams.

The concrete portion of structures will be built only over dry washes; so if material enters the washes, the situation can be cleaned and remedied immediately, preventing degradation of the watercourse.

Policy (12) A requirement to return the flow of streams as nearly as possible to a meandering thread without creating a possible future bank erosion problem when operations are completed.

Stream flows will not be altered from their original course by this project, therefore this policy is not applicable.

Policy (13) A requirement that material derived from roadway work should not be deposited in a live stream channel where it could be washed away by high stream flows.

Maintenance operations will occur on only one live stream, where no roadway work material will be deposited. All other work will occur on dry streambeds.

Policy (Other Pollutants) A requirement that plans and procedures be prepared for facilities and activities within a watercourse to protect water from pollution with fuels, oil, bitumens, calcium chloride and other harmful materials.

Pollutants will not be entered into live stream channels. The project as described, does not contain pollutants. In addition, to reduce the potential for spills, refueling and emergency repair areas will be located well away from washes. Any spill of toxic material will be reported immediately, contained by

earthen dikes or sand bags and remedied immediately. Clean material will be used to construct structures; no polluted silt or other material will be placed in the washes. Debris and rock will be removed upon completion of the project. Debris that has polluted washes within the project area will be cleaned up by military personnel.

Policy The person responsible for the activity should be (Monitoring)require to monitor for turbidity every day in which there is a disturbance of the bed of the waterway. Monitoring should be performed not greater than one and one-half miles downstream from the construction or related operations, and may be required at different frequencies and for other parameters to demonstrate compliance with water quality standards.

Placement of structures will occur while all washes are inactive and dry. Therefore, this policy is applicable only in one wash, Whitewater wash, where only gravel will be deposited near or in the live stream channel. The portion of Whitewater wash which will receive the gravel is located in SE 1/4, Section 15, Township 24 S., Range 27 E. During field visits on 5 and 30 November, 1992, the perennial portion of the wash was approximately 6 inches deep and was about 10 feet wide, with a very slow flow-through. Project construction will be postponed during flood events, and will commence when the streambed is dry. Possible turbidity increases due to the maintenance activity will be minimized by crossing the stream only when necessary. If required, a monitor will be available for the perennial portion of the stream.

At present, and during most of the year, all washes but one are inactive and dry. Only Whitewater wash is perennial. Normal rainfall is 13 to 16 inches per year. In the event of flooding, construction will be stopped until the washes are dry. Further, care will be taken to ensure that no construction silt, debris or other potentially polluting materials are deposited in the washes. In addition, the following prevention measures will be used: clean material will be used to construct structures; debris and rock will be removed upon completion of the project; refueling and emergency repair areas will be located well away from washes; spills will be reported immediately, contained by earthen dikes or sand bags and remedied immediately; and debris that has polluted washes within the project area will be cleaned up by military personnel.

Minimum vegetation will be disturbed while maintaining the road. No grubbing or clearing is planned.

Policy (3) is not applicable to this project.

Policy (4) is not applicable to this project. However, if any type of toxic material spill occurs, it will be reported, contained by earthen dikes or sand bags and remedied immediately.

Prevention measures are discussed in Policy (1). This policy not applicable to this project.

Corrugated steel pipe culverts will be used; they will be compacted within the washes to prevent excessive erosion or ponding. A portion of the maintenance on the west side of Douglas includes the repair of existing check dams, which are functioning but need damage from vandalism repaired.

Placement of structures will occur while washes are inactive and dry; no materials will be remove from flowing stream channels. Therefore, this policy is not applicable.

This Policy is applicable to the one live streambed in this project. The streambed, at Whitewater wash, will have maintenance performed on the slope to the stream, (light blading of the roadway) and clean fill (large gravel) will be placed in the streambed to prevent

muddying and increase passability for the maintenance operation and future use.

Policy (9) is not applicable to this project, as no aggregate will be washed.

Construction equipment will be maintained to ensure that no significant amounts of oils or greases are allowed to contaminate the construction site. Personnel will immediately clean and dispose of any oils or greases accidently spilled. Other prevention measures are discussed in Policy (1).

The concrete portion of structures will be built only over dry washes; so if material enters the washes, the situation can be cleaned and remedied immediately, preventing degradation of the watercourse.

Stream flows will not be altered from their original course by this project, therefore this policy is not applicable.

Maintenance operations will occur on only one live stream, where no roadway work material will be deposited. All other work will occur on dry streambeds.

Pollutants will not be entered into live stream channels. The project as described, does not contain pollutants. In addition, to reduce the potential for spills, refueling and emergency repair areas will be located well away from washes. Any spill of toxic material will be reported immediately, contained by earthen dikes or sand bags and remedied immediately. Clean material will be used to construct structures; no polluted silt or other material will be placed in the washes. Debris and rock will be removed upon completion of the project. Debris that has polluted washes within the project area will be cleaned up by military personnel.

Placement of structures will occur while all washes are inactive and dry. Therefore, this policy is applicable only in one wash, Whitewater wash, where only gravel will be deposited near or in the live stream channel. The portion of Whitewater wash which will receive the gravel is located in SE 1/4, Section 15, Township 24 S., Range 27 E. During field visits on 5 and 30 November, 1992, the perennial portion of the wash was

approximately 6 inches deep and was about 10 feet wide, with a very slow flow-through. Project construction will be postponed during flood events, and will commence when the streambed is dry. Possible turbidity increases due to the maintenance activity will be minimized by crossing the stream only when necessary. If required, a monitor will be available for the perennial portion of the stream.

THE EVALUATION OF THE EFFECTS
OF THE DISCHARGE OF DREDGED OR FILL MATERIAL
INTO THE WATERS OF THE UNITED STATES
(Section 404 Evaluation)
JTF-6
DOUGLAS, COCHISE COUNTY, ARIZONA

I. INTRODUCTION. The following evaluation is provided in accordance with Section 404 (b)(1) of the Federal Water Pollution Control Act Amendments of 1972 (Public Law 92-500) as amended by the Clean Water Act of 1977 (Public Law 95-217). Its intent is to succinctly state and evaluate information regarding the effects of discharge of dredged or fill material into the waters of the U.S. As such, it is not meant to stand alone and relies heavily upon information provided in the environmental document to which it is attached. Citation in brackets [ ] refer to expanded discussion found in the Environmental Assessment (EA), to which the reader should refer for details.

II. PROJECT DESCRIPTION.

A. Location [1.2]: The project is located in Douglas, Cochise County, Arizona, along the U.S. and Mexico border (Figure 1). The fence site is on land owned by the U.S. Border Patrol and is located about 1 mile north of the City of Douglas. All drag roads and the mountain road are located within the U.S. boundary (Figure 2).

B. General Description [2.2]: This Environmental Assessment (EA) addresses three components, the maintenance of 24 miles of an existing drag road east and west of Douglas, Arizona, the maintenance of about one mile of mountain road east of Douglas, Arizona, and the installation of fences at the U. S. Border Patrol Station at Douglas, Arizona. The road maintenance will consist of light grading, installation of culverts, grading and shaping for drainage, placing gravel in a slowly flowing wash and resetting existing cattle guards. The project will provide maintenance which the Border Patrol does not have the equipment or personnel to perform. The intent is to repair the erosion damage on the existing drag roads and make the mountain road passable for use of the Border Patrol only. The construction will be accomplished by military personnel and will be part of their training. Project construction will take about 60 days and is scheduled to occur between 5 February 1993 and 9 April 1993.

C. Authority and Purpose: The Secretary of Defense established Joint Task Force Six (JTF-6) on 13 November 1989. The purpose of Joint Task Force Six (JTF-6) Douglas is to provide the U.S. Border Patrol with access to the border areas to spot and interdict drug trafficking and smuggling activities. The operation will also provide the Border Patrol with a more secure station.

D. Description of the Proposed Discharge Site: [2.2.1, 2.2.2] The proposed discharge site is located west of Douglas, Arizona within United States Border. The existing roadway passes through Whitewater Draw, where gravel will be placed in the stream bed to aid traction of the Border Patrol vehicles on the firm bottom of the wash.

E. Description of Disposal Method [3.2]: Steel pipe culverts will be used. Gravel will be deposited in some dry channels and in Whitewater Draw, the only live stream in the project.

III. FACTUAL DETERMINATIONS.

A. Disposal Site Physical Substrate Determinations:

1. The project is located in the Mexican Highland of south-central Arizona. The project is situated in mountainous setting at an elevation of about 4,000 feet above sea level. The region is characterized by numerous low, rugged mountain ranges separated by canyons. Whitewater Draw (perennial) flows through the western part of the project and will have gravel placed in its channel. All other channels, some of which will have culverts placed on them, are ephemeral.

2. Sediment type. During construction of culverts sand particles may occur from wash beds, therefore, sediment will be compatible with the material associated with the wash beds.

3. Dredged/Fill Material Movement. Most of the construction material for the roads will be available on site. All pouring of cement will be accomplished in dry washes only. Any additional material (stones/wood) required to construct the roads or culverts will be obtained from quarry sites near the City of Douglas, if needed. At the present time, most washes in the project area are dry. However in the event of heavy rains that cause flooding, construction would be postponed until the washes dried up. Further, no silt or other potentially polluting materials will be put in the washes.

4. Physical Effects on Benthos: Not applicable to the proposed project.

5. Action Taken to Minimize Impacts. __X__ Yes ____ No

IV. Effect on Water Circulation, Fluctuation, and Salinity Determinations:

A. Effect on Water [Section - 5.3]. The following potential impacts were considered:

a.	Salinity	N/A	X	INSIGNIF.	SIGNIF.
b.	Water Chemistry (pH, etc.)	N/A	X	INSIGNIF.	SIGNIF.
c.	Clarity	N/A	X	INSIGNIF.	SIGNIF.
d.	Color	N/A	X	INSIGNIF.	SIGNIF.
e.	Odor	N/A	X	INSIGNIF.	SIGNIF.
f.	Taste	N/A	X	INSIGNIF.	SIGNIF.
g.	Dissolved gas levels	N/A	X	INSIGNIF.	SIGNIF.
h.	Nutrients	N/A	X	INSIGNIF.	SIGNIF.
i.°	Eutrophication	N/A	X	INSIGNIF.	SIGNIF.
j.	Others	N/A	X	INSIGNIF.	SIGNIF.

B. Effect on Current Patterns and Circulation. The potential of discharge or fill on the following conditions were evaluated:

C.	Current Pattern & Flow	N/A	X	INSIGN.	SIGN.
	1. Velocity	N/A	X	INSIGN.	SIGN.
	2. Stratification	N/A	X	INSIGN.	SIGN.
	3. Hydrology Regime	N/A	X	INSIGN.	SIGN.

D. Effect on Normal Water Level Fluctuations. The potential effect of discharge or fill on tide and river stages is not applicable to this project.

V. Suspended Particulate/Turbidity Determinations at the Disposal Site. Project construction will occur during February-April, most of these washes will be dry (precipitation received during these months ranges from 2 to 3 inches). In the event of heavy rains/flooding construction would be postponed. Construction of culverts will reduce erosion, therefore, turbidity will be controlled.

A. Expected Change in Suspended Particulate and Turbidity levels in Vicinity of Disposal Site: These impacts are considered insignificant because they will be distributed over a relatively small area and will be short term in duration. All washes, but one, are dry within project area.

Impact: N/A X INSIGNIF. SIGNIF.

B. Effects (degree and duration) on Chemical and Physical Properties of the Water Column [4.3., 5.3].

a.	Light Penetration	N/A	X	INSIGNIF.	SIGNIF.
b.	Dissolved Oxygen	N/A	X	INSIGNIF.	SIGNIF.
c.	Toxic Metals & Organic	N/A	X	INSIGNIF.	SIGNIF.
d.	Pathogen	N/A	X	INSIGNIF.	SIGNIF.
e.	Esthetics				
	Temporary effect expected	N/A	X	INSIGNIF.	SIGNIF.
f.	Others	N/A	X	INSIGNIF.	SIGNIF.

1. Effects of Turbidity on Biota: These impacts are considered insignificant because most of the washes within the project area are dry, involve a relatively small area and will be short term in duration.

a. Primary Productivity ____N/A__X__INSIGNIF.____SIGNIF.

b. Suspension/Filter Feeders ____N/A__X__INSIGNIF.____SIGNIF.

c. Sight feeders ____N/A__X__INSIGNIF.____SIGNIF.

2. Actions taken to minimize impacts. In case of a flood occurrence, the project construction will be postponed until washes dry out.

VI. Contaminant Determination

No chemical or biological impacts are expected at the disposal site.

VII. Effect on Aquatic Ecosystem and Organism Determinations:

A. The Following ecosystem effects were evaluated [5.2.3]: The proposed maintenance and repair of the drag roads and mountain road and fence installation would have no significant effect on aquatic organisms, special aquatic sites, or threatened and endangered species.

1. On Plankton ____N/A__X__INSIGNIF.____SIGNIF.
2. On Benthos ____N/A__X__INSIGNIF.____SIGNIF.
3. On Nekton ____N/A__X__INSIGNIF.____SIGNIF.
4. Food Web ____N/A__X__INSIGNIF.____SIGNIF.

Sensitive Habitats:

1. Sanctuaries, refuges ____N/A__X__INSIGNIF.____SIGNIF.
2. Wetlands ____N/A__X__INSIGNIF.____SIGNIF.
3. Mudflats ____N/A__X__INSIGNIF.____SIGNIF.
4. Eelgrass beds ____N/A__X__INSIGNIF.____SIGNIF.

Riffle and Pool Complexes
_X___N/A____INSIGNIF.____SIGNIF.

Threatened & Endangered Species
_X___N/A____INSIGNIF.____SIGNIF.

Other Wildlife (grunion,trout)
____N/A__X__INSIGNIF.____SIGNIF.

B. Actions to Minimize Impacts:

1. Proposed Disposal Site Determinations: Is the mixing zone for the disposal site confined to the smallest practicable

Zone? Yes. JTF-6 has submitted WQMS-301.030 forms to the Arizona Water Quality Management Unit to document compliance with Water Quality Standards.

2. Determination of Cumulative Effects of Disposal or Fill on the Aquatic Ecosystem: No such cumulative impacts are anticipated as a result of proposed project.

Impacts: ____N/A__X__INSIGNIF.____SIGNIF.

3. Determination of Indirect Effects of Disposal or Fill on the Aquatic Ecosystem:

Impacts: ____N/A__X__INSIGNIF.____SIGNIF.

VIII. FINDING OF COMPLIANCE.

A review of the proposed project indicates that:

A. The discharge represents the least environmentally damaging practicable alternative and if in a special aquatic site, the activity associated with the discharge must have direct access or proximity to, or be located in the aquatic ecosystem to fulfill its basic purpose

___X__YES _____NO

B. The activity does not appear to: 1) violate applicable state water quality standards or effluent standards prohibited under Section 307 of the CWA; 2) jeopardize the existence of Federally listed endangered or threatened species or their habitat; and 3) violate requirements of any Federally designated marine sanctuary.

__X___ YES _____ NO

C. The activity will not cause or contribute to significant degradation of waters of the U.S. including adverse effects on human health, life stages of organisms dependent on the aquatic ecosystem, ecosystem diversity, productivity and stability, and recreational, aesthetic, and economic values;

___X__YES ____NO

D. Appropriate and practicable steps have been taken to minimize potential adverse impacts of the discharge on the aquatic ecosystem.

___X___YES ____NO

On the Basis of the Guidelines, the Proposed Disposal Site(s) for the Discharge of Dredged or Fill Material (specify which) is (select one):

_____ (1) Specified as complying with the requirements of these guidelines; or,

__X__ (2) Specified as complying with the requirements of these guidelines, with the inclusion of appropriate and practical conditions to minimize pollution or adverse effects on the aquatic ecosystem;or,

_____ (3) Specified as failing to comply with the requirements of these guidelines.

APPENDIX C

COMMENT LETTERS

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
ARIZONA ECOLOGICAL SERVICES FIELD OFFICE
3616 West Thomas Road, Suite 6
Phoenix, Arizona 85019

Telephone: (602) 379-4720 FAX: (602) 379-6629
January 14, 1993

Colonel R.L. VanAntwerp
District Engineer
U.S. Army Corps of Engineers
Los Angeles District
Attn: Ms. Laura Tschudi, Chief
Environmental Design Section
300 North Los Angeles Street
Los Angeles, CA 90012-2325

Dear Colonel VanAntwerp:

The U.S. Fish and Wildlife Service (Service) has reviewed the draft Environmental Assessment (EA) prepared for the Joint Task Force Six (JTF-6) Project at Douglas, Cochise County, Arizona. We appreciate the efforts of the U.S. Army Corps of Engineers (Corps) in preparing the draft EA. Our comments are enclosed for your review.

In Section 1.1, Project Summary, we note that the military unit may possibly work at the project site up to March, 1994. We request notification of on-going construction work, including dates, if the original construction schedule is revised and work continues past April 9, 1993.

Section 1.3 notes that short and long-term impacts associated with the project are not anticipated to be significant. The Service can only agree with this statement if construction activities are limited to those proposed in the document, and if there is sufficient supervision to ensure that damage incurred is minimal. The report notes that "The project has been designed to avoid and/or minimize adverse environmental impacts by imposing environmental constraints on the construction activities" (p. 4). As there are multiple construction sites on the Douglas road, it appears the U.S. Army project leader, Executive Officer Ken Nadermann, will not be able to supervise each of the working sites. We recommend that the EA clearly state who is responsible for ensuring that environmental constraints are adhered to, and that biological monitors be provided to facilitate compliance with the EA. A qualified biologist should act as monitor and should be present at the site at all times, from initial surveys through final clean-up. The biologist and all construction personnel should be briefed on the environmental commitments made in the EA.

One of our primary concerns with all of the JTF-6 projects, including work to be done at the Douglas site, is future erosion. Work conducted last year has already been damaged in some areas by erosion. Field investigations in 1992 indicated that damaged areas will be repaired using largely the same techniques that were used last year and that have proven ineffective. The Service recommends that the Army determine if better erosion prevention techniques are available that will withstand the rainfall patterns and erosion common in this area. Revegetation or use of articulated revetment along the banks of washes in the immediate vicinity of the road and surrounding culverts may also help to reduce erosion.

The Service does not see the need for clearing an additional 10 feet of land alongside the existing road during maintenance activities. Almost all of the existing road is more than sufficiently wide for its intended use, and the Service believes that construction activities can be limited to the existing cleared surface. If the same construction methods continue to be used, it is expected that erosion will continue and repairs will again be required in the near future. Vegetation in the additional 10-foot area adjacent to the road will not have adequate time to rehabilitate if there is continual disturbance for road repairs.

On the mountain road, clearing an additional 10 feet could result in major vegetative disturbance. As noted during our field investigations in November, 1992, mature vegetation is present immediately adjacent to the road. The EA indicates that less than 15 non-flowering paniculate agave (Agave palmeri) will be impacted (p. 36), and that non-flowering plants that would be impacted will be relocated. As the EA indicates, the status of Palmer agave and lesser long-nosed bats (Leptonycteris curasoae yerbabuenae) are considered to be linked (p. 25). The final report should indicate the types of transplanting techniques that will be used to ensure that relocated plants will survive. In addition, the EA should indicate who will be responsible for transplanting the agave. The Department of Agriculture representative present at the November 31, 1992 meeting in Douglas indicated that it would be difficult to find individuals willing to participate in relocation efforts for this phase of the project due to its remote location. If transplant techniques provided in the final EA are adequate to ensure survival of the relocated agaave, and if these techniques are correctly implemented, the Service does not anticipate a need for formal Section 7 consultation.

There are other types of vegetation in the area, including mature mesquite (Prosopis juliflora var. velutina), that provide valuable habitat and are found adjacent to the road. The Service understands that some widening will be necessary in order for heavy equipment to pass through. However, we believe these sites should be specifically identified, approved through the biological monitor, and marked. Areas not marked should not be cleared. The statement that "An additional 10-feet...along road sides will be used for construction limits..." should not be perceived as a blanket approval for unnecessary or avoidable vegetation removal.

Section 2.2.1 discusses the maintenance of existing drag roads. The EA indicates that gravel will be placed in White Water Wash and other washes to improve traction and help reduce erosion. The Service requests that the final EA clarify the permitting process applicable to these actions. Desert washes are important to wildlife as movement corridors and sources of food and cover. Washes generally have a higher density and diversity of species than the surrounding desert. The Service stresses the need for protection of all desert washes.

The Service supports the use of areas disturbed during last year's road construction activities for staging areas and bivouac sites. We request that activities in these areas be kept within the current boundaries of disturbance.

Section 2.2.6 (p. 16) on the borrow area and waste disposal mentions the use of 3/8 inch "Flux" to stabilize road surfaces. Clarification is necessary to determine whether this is a process or chemical that will be used. In addition, the intent behind the sentence "All material used on roads and in washes will have organic material removed for stability" is unclear.

The Service disagrees with the statement that erosion potential is low to moderate for this project site (p. 18). Field investigations in 1992 noted several areas of severe erosion at culvert sites and in areas where the road sloped down to natural drainages. Our comments on prevention of future erosion are discussed above.

Section 4.2.2.1 discusses vegetation in the project area. The Service requests that scientific names follow the common names the first time a species is referenced within the text. In addition, the following species should be added to Table 1 as observed species:

Sporobolus airoides	Alkali Sacaton
Calliandra eriophylla	Fairy Duster
Opuntia violacea	Purple Prickly Pear
Prosopis juliflora var. velutina	Velvet Mesquite

We request that scientific names of wildlife species also be referenced within the text the first time each species is mentioned. Due to the lack of scientific names, there is some confusion as to which deer species are referenced in the EA. Section 4.2.2.2 mentions mule deer (Odocoileus hemionus crooki), white-tailed deer (Odocoileus virginianus couesi) and Coue's deer. It is unclear which species is meant by Coue's deer.

Both the reptile/amphibian discussion and the bird discussion mention additional species which might occur in the area. Attached is a list of additional mammal species which may occur in the area based on habitat preference, actual observations, and distribution maps as provided in Brown (1973 and 1982) and Hoffmeister (1986). This list could be incorporated as Table 2.

Brown (1982) also indicates that the following reptile species are often associated with this type of habitat:

Desert Box Turtle (Terrapene ornata luteola)
Desert Grassland Whiptail (Cnemidophorus uniparens)
Mexican Hognose Snake (Heterodon nasicus bennerlyi)
Southwestern Earless Lizard (Holbrookia texana scitula)
Western Green Toad (Bufo debilis insidior)
Western Hooknose Snake (Ficimia cana)

In addition, you may wish to reference the enclosed copy of a brochure provided to our office by Greg Yuncevich with the Bureau of Land Management for bird species observed in the study site.

A formal species list request was received in our office on December 7, 1992. A response was forwarded in compliance with your request on January 6, 1993. This information can now be incorporated into the endangered species section (pg. 22) of the final report. As you are aware, endangered and threatened species are protected under the Endangered Species Act and must be considered prior to project development. While candidate species are not protected under Federal Law, we recommend your consideration of them during project development. In addition, we recommend the following changes to the existing section of the EA:

Paragraph 2, page 23: Delete the sentence "These bats are adapted for life in arid deserts of the southwestern U.S., Mexico, and Central America." These bats live in areas other than arid deserts.

Paragraph 2, page 23: Change the third to last sentence to read "In the fall (October and November) the bats migrate south to feed on later blooming agaves and in winter feed on flowering trees of central and southern Mexico."

Paragraph 3, page 25: Delete "specialized" from the second sentence.

Paragraph 1, page 26: Delete "(at night)".

Section 4.2.4 discusses candidate species. Information provided by the Arizona Game and Fish Department (AGFD) concerns State listed species. The AGFD maintains separate lists of species identified as endangered, threatened or candidate at the State level.

Section 6.0 on Coordination references the Service as the U.S. Fish and Wildlife Service. Please expand this to read "U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office".

Our primary concern continues to be the failure to address the cumulative effects of the JTF-6 projects being implemented. National Environmental Policy Act (NEPA) compliance continues to be done separately for small segments of the overall project. We believe that these project segments meet NEPA definitions of connected, cumulative, and similar actions and as such they should be addressed within one NEPA document. The EA states that the Ft. Worth Corps office is preparing a programmatic Environmental Impact Statement (EIS). However, we have received no notice as to the progress of this report. Several project segments which should be included in that EIS are already completed or underway.

As outlined in the EA, the construction activities associated with this project segment do not cause the Service a large degree of concern. However, past problems associated with JTF-6 projects indicate that construction activities are not always limited to those outlined in the EA and disturbance often occurs outside the scope of the project. Our correspondence files contain meeting information and correspondence from 1990 discussing these concerns. We hope this project will serve to enhance environmental compliance and the working relationship between the Service and the Corps.

We appreciate the opportunity to provide comments on this EA. If you have any question, please contact Mary Richardson.

Sincerely,

Sam F. Spiller

Sam F. Spiller
Field Supervisor

Enclosures

cc: Regional Director, Fish and Wildlife Service, Albuquerque, New Mexico (AWE)
Rick Gerhardt, Arizona Game and Fish Department, Tucson, Arizona
Robert Anderson, U.S. Army, Ft. Monroe, Virginia

Additional Mammal Species
Potentially Found in the Project Site

California Leaf-Nosed Bat (Macrotus californicus)
Long-tongued bat (Choeronycteris mexicana) (Summer Only)
Sanborn's Long-Nosed Bat (Leptonycteris sanborni) (Summer Only)
Cave Myotis (Myotis velifer velifer) (Winter Range)
Fringed Myotis (Myotis thysanodes thysanodes) (Winter Range)
Long-legged Myotis (Myotis volans interior)
California Myotis (Myotis californicus californicus) (Winter Range)
Small-footed Myotis (Myotis leibii melanorhinus)
Southern Yellow Bat (Lasiurus ega xanthinus)
Townsend's Big-Eared Bat (Plecotus townsendii)
Pallid Bat (Antrozous pallidus pallidus) (Winter Range)
American Free-tailed Bat (Tadarida brasiliensis mexicana) (Winter Range)
Pocketed Free-tailed Bat (Tadarida femorosacca)
Eastern Cottontail (Sylvilagus floridanus holzneri)
Desert Cottontail (Sylvilagus audubonii minor)
Cliff Chipmunk (Eutamias dorsalis dorsalis)
Harris' Antelope Squirrel (Ammospermophilus harrisii)
Rock Squirrel (Spermophilus variegatus grammurus)
Spotted Ground Squirrel (Spermophilus spilosoma canescens)
Round-tailed Ground Squirrel (Spermophilus tereticaudus neglectus)
Gunnison's Prairie Dog (Cynomys gunnisoni zuniensis)
Botta's Pocket Gopher (Thomomys bottae mearnsi)
Southern Pocket Gopher (Thomomys umbrinus intermedius)
Silky Pocket Mouse (Perognathus flavus flavus)
Rock Pocket Mouse (Perognathus intermedius intermedius)
Desert Pocket Mouse (Perognathus penicillatus penicillatus)
Hispid Pocket Mouse (Perognathus hispidus conditi)
Ord's Kangaroo Rat (Dipodomys ordii ordii)
Banner-tailed Kangaroo Rat (Dipodomys spectabilis spectabilis)
Merriam's Kangaroo Rat (Dipodomys merriami olivaceus)
Western Harvest Mouse (Reithrodontomys megalotis megalotis)
Fulvous Harvest Mouse (Reithrodontomys fulvescens fulvescens)
Cactus Mouse (Peromyscus eremicus eremicus)
Deer Mouse (Peromyscus maniculatus sonoriensis)
White-footed Mouse (Peromyscus leucopus arizonae)
Brush Mouse (Peromyscus boylii rowleyi)
Northern Grasshopper Mouse (Onychomys leucogaster ruidosae)
Southern Grasshopper Mouse (Onychomys torridus torridus)
Arizona Cotton Rat (Sigmodon arizonae cienegae)
Fulvous Cotton Rat (Sigmodon fulviventer mimimus)
Yellow-nosed Cotton Rat (Sigmodon ochrognathus)
White-throated Wood Rat (Neotoma albigula albigula)
Kit Fox (Vulpes macrotis neomexicana)
Western Spotted Skunk (Spilogale gracilis leucoparia)
Striped Skunk (Mephitis mephitis estor)
Hooded Skunk (Mephitis macroura milleri)
Hog-nosed Skunk (Conepatus mesoleucus venaticus)
Bobcat (Felis rufus baileyi)
White-tailed Deer (Odocoileus virginianus couesi)

Literature Cited

Brown, D.E. 1973. The Natural Vegetative Communities of Arizona, State of Arizona, Arizona Resources Information System (ARIS). Phoenix. Map (Scale 1:500,000).

Brown, D.E. 1982. Biotic Communities of the American Southwest-United States and Mexico. Desert Plants, Volume 4, Numbers 1 - 4. University of Arizona, Tucson, Arizona. 342 pp.

Hoffmeister, D.F. 1986. Mammals of Arizona. The University of Arizona Press. Tucson, Arizona. 602 pp.

INTERNATIONAL BOUNDARY AND WATER COMMISSION
UNITED STATES AND MEXICO

OFFICE OF THE COMMISSIONER
UNITED STATES SECTION

JAN 15 1993

Colonel R.L. VanAntwerp
District Engineer
U.S. Army Corps of Engineers
Los Angeles District
Attn: Ms. Laura Tschudi, Chief
Environmental Design Section
300 North Los Angeles Street
Los Angeles, California 90012-2325

Dear Colonel VanAntwerp:

Thank you for the opportunity to review the Draft Environmental Assessment (DEA) for Joint Task Force Six Operation, Douglas, Cochise County, Arizona, dated December 1992.

As you are aware, the United States Section (U.S. Section) of the International Boundary and Water Commission, United States and Mexico (Commission) by virtue of the 1944 Water Treaty (TS 994; 59 Stat. 1219) and agreements concluded thereunder by the United States and Mexico is responsible for ensuring that the United States Government meets the obligations incurred in those agreements. In this respect, we ask that the maintenance of approximately 39 kilometers (24 miles) of existing drag road east and west of Douglas Arizona, the maintenance of approximately 1.6 kilometers (1 mile) of mountain road east of Douglas, and the installation of fences at the U.S. Border Patrol Station at Douglas be performed in a manner that will not adversely impact upon: (1) the visibility and permanency of the international boundary monuments, (2) the present drainage patterns to and from Mexico, and (3) that all potential sanitation problems be properly addressed to insure that no pollution occurs in either country.

We note that the maintenance activities proposed to occur on the drag road will take place directly adjacent to the international border. Regarding (1) visibility and permanency of international boundary monuments, we note in Section 8.0, Environmental Commitments, that the proposed project will not impact the monuments. We ask, too, that no waste or construction materials be piled in the areas near the international boundary. The Mexican Government, through the Mexican Section of the Commission, has advised that any encroachment by personnel, equipment, or material associated with this fence construction and road maintenance activities into Mexico is not authorized. We ask that any fence or road work not take place any closer than two feet north of the boundary to avoid any accident of encroachment into Mexico.

THE COMMONS, BUILDING C, SUITE 310 • 4171 N. MESA STREET • EL PASO, TEXAS 79902
(915) 534-6700 • (FTS) 570-6700

Regarding (2) the present drainage patterns to and from Mexico, we note that your operation will involve the installation of culverts, grading and shaping for drainage, the placement of gravel in a slowly flowing wash, and the resetting of existing cattle guards. We must ask that the proposed project be constructed in such a way as to avoid any alteration of present drainage patterns. Specifically, we ask that you provide PE Jose S. Valdez, (915) 534-6693, the plans for these drainage structures as soon as possible for our review insofar as it impacts transboundary drainage.

The U.S. Section and the Mexican Section of the Commission have agreed that no transboundary pollution or other sanitation problems will occur from new developments along the international boundary. We therefore ask that you insure no transboundary sanitation problems occur as a result of the proposed project.

Thank you again for the opportunity to review and comment on your proposed project. Please send us two (2) copies of the Final Environmental Assessment (EA) when it becomes available.

Sincerely,

Conrad G. Keyes, Jr.
Principal Engineer, Planning

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

FIFE SYMINGTON, GOVERNOR
EDWARD Z. FOX, DIRECTOR

WQMS-389.011

January 19, 1992

Colonel R.L. VanAntwerp
District Engineer
U.S. Army Corps of Engineers
Los Angeles District

Attn.: Ms. Laura Tschudi (CESPL-PD-RL)
Chief, Environmental Design Section
P.O. Box 2711, Room 6650
Los Angeles, CA 90053-2325

RE: DRAFT ENVIRONMENTAL ASSESSMENT FOR THE JOINT TASK FORCE SIX - DOUGLAS, COCHISE COUNTY, ARIZONA

Dear Colonel VanAntwerp:

The Water Assessment Section of the Arizona Department of Environmental Quality (ADEQ) has concluded our review of the above referenced project relative to water quality impacts. Thank you for giving us the opportunity to review this project prior to implementation. Since we have not been on site as a part of this project review, our comments must be limited to those which could be ascertained in our office from the information you have sent us and information from our files and other available data sources.

A. Comments specific to the text of the EA are as follows:

1. Section 2.2.5 Bivouac Area.: Be advised that other permits or approvals may be required by County Health Departments, ADEQ, or the U.S. Environmental Protection Agency when the overall project includes a potable water supply, wastewater reuse facilities, or wastewater collection/holding/treatment/disposal facilities.

2. Section 2.2.6 Borrow Area and Waste Disposal.: All off-site material sources for the project must have valid and current permits under the Federal Clean Water Act [Sections 402 (NPDES) and 404 (Dredge and Fill)] and the State Aquifer Protection Program, where necessary. Facilities and activities not covered by individual permits under these programs are not exempt from the duty to comply with water quality standards for surface waters and aquifers, and will be subject to compliance action, including possible closure by ADEQ if violation is documented. Other permits pertaining to air quality may be required for material sources. Ensuring that these sources have valid and current permits is the responsibility of the USACOE.

3. Section 6.0 COORDINATION.: "Arizona Department of Environmental Quality, Water Quality Management Section" should read "Arizona Department of Environmental Quality, Water Assessment Section".

4. Section 7.5 Clean Water Act of 1977, as amended (Public Law 95-217).: This project may qualify under a Nationwide 404 Permit but still require state certification by ADEQ. Identify which Nationwide Permit this project qualifies under (by number) and contact Mr. James Matt at (602) 207-4502 to determine whether a state certification is necessary.

5. Section 8.0 under ENVIRONMENTAL COMMITMENTS: When this project is physically commenced at the construction site, ADEQ must be notified within seven days of the start date. When this notification is made, please provide the start date and the name of a contact person to be on site. ADEQ may conduct inspections to determine compliance with surface water quality standards (A.A.C. R18-11-1). When the project is complete ADEQ must be similarly notified. Notification must be addressed to Melinda Longsworth at ADEQ, 400 West Congress Street, Suite 433, Tucson, Arizona 85701 (602) 628-6740.

6. Section 8.3 under ENVIRONMENTAL COMMITMENTS: Please elaborate more specifically on the "Appropriate control techniques" that will be utilized to minimize turbidity in the washes during construction.

7. Section 8.5 under ENVIRONMENTAL COMMITMENTS: "...debris and rock will be removed..." should read "...construction debris and rock will be removed...".

8. Section 8.6 under ENVIRONMENTAL COMMITMENTS: "Debris in washes..." should read "Construction debris in washes...".

B. General comments with regard to the EA are as follows:

1. Throughout the text, Whitewater Draw has been incorrectly referred to as White water wash.

2. Please add the following name to the mailing list and coordinate all future projects through this person:

   Mr. Edwin K. Swanson, P.E.
   Arizona Department of Environmental Quality
   Water Assessment Section
   P.O. Box 600
   Phoenix, Arizona 85001-0600
   (602) 207-4501

3. To ensure timely acquisition of a state certification (if necessary, see item A.4. above), ADEQ should be consulted during the initial planning and coordination phase of the project. The person to be contacted is listed in item A.4.

4. ADEQ Nonpoint Source personnel have requested that all EAs acknowledge and make reference to Arizona Executive Orders No. 89-16 and 91-6 which pertain to protection of streams and riparian areas. These Executive Orders are attached for you to use in this EA as well as in all future EAs.

Once again, thank you for giving us the opportunity to review this project.

Sincerely,

Melinda K. Longsworth
Surface Water Hydrologist
Point Source and Monitoring Unit

MKL:mkl

cc: Edwin Swanson
James Matt
James Maston
Larry Stephenson

EXECUTIVE ORDER
NO. 89-16

STREAMS AND RIPARIAN RESOURCES

WHEREAS, trees, shrubs, and grasses that grow along Arizona's surface and subsurface water courses form one of the State's most unique, rare, and endangered ecosystems: streams and riparian areas; and

WHEREAS, riparian resources are of substantial economic importance to the State of Arizona due to their numerous uses for grazing, mining, farming, timber harvesting, recreational and residential development; and

WHEREAS, stream and riparian areas in their natural condition can increase groundwater recharge, maintain or improve water quality, provide recreational opportunities and wildlife habitat, and offer open space with aesthetic and natural values; and

WHEREAS, Arizona's population growth will bring additional pressure to bear upon these rapidly diminishing resources; and

WHEREAS, to facilitate the accomplishment of statewide recognition, protection, and proper utilization of Arizona's stream and riparian resources, state and federal agencies and citizen groups have for the past fifteen months assessed the issues surrounding the management of riparian resources;

NOW, THEREFORE, I, Rose Mofford, Governor of the State of Arizona, do hereby direct:

1. All state agencies to determine whether current and proposed policies, actions, requirements, and funding impact on stream and riparian resources and, when appropriate, to implement changes that will allow for restoration of riparian resources; and

2. The formation of a riparian habitat task force composed of representatives from the State Land Department, State Parks Department, Department of Water Resources, Department of Environmental Quality, Game and Fish Department, Department of Commerce, Office of Tourism, Department of Transportation, and the State Geologic Survey which shall be chaired by a representative of the Commission on the Arizona Environment. The task force shall:

a) develop a classification system for riparian habitat to be used by all State agencies;
b) inventory existing riparian areas;
c) identify key riparian areas;
d) make recommendations for further State agency action, public awareness and education programs, and incentives for private landowner cooperation;
e) consult with members of the public, Indian tribes, local government, federal agencies, and private groups;
f) make legislative recommendations;
g) report its findings and recommendations to the Governor no later than October 31 of each year.

IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed on the Great Seal of the State of Arizona.

Rose Mofford

GOVERNOR

DONE at the Capitol in Phoenix this tenth day of June in the Year of Our Lord One Thousand Nine Hundred and Eighty-Nine and of the Independence of the United States of America the Two Hundred and Thirteenth.

ATTEST:

Jim Rhumway

Secretary of State

GOVERNOR'S RIPARIAN HABITAT TASK FORCE
POLICY

A Riparian Area is defined as:

> "an aquatic or terrestrial ecosystem that is associated with bodies of water, such as streams, lakes, or wetlands, or is dependent upon the existence of perennial, intermittent or ephemeral surface or subsurface water drainage."

Riparian areas contribute to the well-being and quality of life of the citizens of Arizona. Cultural and natural resources associated with these areas are of substantial economic and aesthetic importance to the State of Arizona. Because riparian areas are typically associated with high water tables, they are particularly rare in the arid Southwest. Riparian areas are not closed ecosystems, but are dynamically interrelated with the entire surrounding watershed. Naturally flowing streams and riparian areas help maintain water quality and improve degraded water by removing, transforming, and retaining nutrients, sediments, and other natural and human-made pollutants. Other significant functions of riparian areas are groundwater recharge and the reduction of streambank erosion during flooding. It is estimated that 75% or more of Arizona's wildlife are dependent upon riparian areas for some portion of their life cycle. Healthy riparian habitats are critical for the survival of the majority of Arizona's fish and wildlife species.

Beginning with the first visitors to the Southwest nearly 12,000 years ago, continuing on up to the prehistoric farmers, Spanish missionaries, early Anglo settlers and today's urban and rural residents, man has been drawn to these riparian environments. Arizonans have used these valuable areas for recreation, timber harvest, establishment of cities and towns, transportation, livestock grazing, food gathering and farming, pumping of groundwater, diversion of surface water, and the extraction of other resources such as minerals and mineral materials. With the significant increase in the State's population in the last century and the development of modern technology, these practices have led to substantial alteration in the natural character of these environments and a loss in the multiple resource values found there.

Desert streams such as the Gila, Salt, and Santa Cruz Rivers which once flowed year round, now flow intermittently or not at all. Five of the 32 native fish species found in Arizona at the turn of the century no longer occur here and 22 of the remaining 27 are either listed by the State as endangered or are under study for listing. It is estimated that over 90% of the native riparian areas along our major desert watercourses have been lost, altered, or degraded. It is recognized that past changes in those areas, particularly the alteration and loss of the State's surface water flows, have been detrimental to Arizona's riparian areas.

These dramatic changes in our riparian areas continue today as rapid population growth brings ever increa pressures and demands on the State's riparian resources. It is essential to achieve and maintain a balance among the competing uses of the State's riparian resources to ensure that those areas are protected and enhanced for the benefit of present and future generations. There is a growing recognition of the value a importance of Arizona's diverse riparian areas. Cooperative efforts among groups and individuals to resto protect, and manage these resources have increased significantly.

In recognition of the critical nature of riparian areas to the State, it is hereby determined that the policy of th State of Arizona shall be:

- To recognize that the protection and restoration of riparian areas are of critical importance to the State.
- To actively encourage and develop management practices that will result in maintenance of existing riparian areas and restoration of degraded riparian areas.
- To promote public awareness through the development of educational programs of the benefits and values of riparian areas and the need for their protection and careful management.
- To seek and support cooperative efforts and local group and citizen involvement in the protection, maintenance, and restoration of riparian areas.
- To actively encourage the preservation, maintenance, and restoration of instream flows throughout the State.
- Any loss or degradation of riparian areas will be balanced by restoration or enhancement of other ripari areas of equal values and functions.

EXECUTIVE ORDER
NO. 91-6

PROTECTION OF RIPARIAN AREAS

WHEREAS, a riparian area is defined as "an aquatic or terrestrial ecosystem that is associated with bodies of water, such as streams, lakes, or wetlands, or is dependent upon the existence of perennial, intermittent, or ephemeral surface or subsurface water drainage"; and

WHEREAS, riparian areas contribute to the well-being and quality of life of the citizens of Arizona; and

WHEREAS, cultural and natural resources associated with these areas are of substantial economic and aesthetic importance to the State of Arizona, and these areas provide important recreational opportunities, such as boating, hiking, hunting and fishing; and

WHEREAS, Arizonans have used these valuable areas for recreation, timber harvest, establishment of cities and towns, transportation, livestock grazing, food gathering and farming, pumping of groundwater, diversion of surface water, and the extraction of other resources, such as minerals and mineral materials; and

WHEREAS, with the significant increase in the State's population in the last century and the development of modern technology, the above-mentioned practices have led to substantial alteration in the natural character of these environments and a loss in the multiple resource values found there; and

WHEREAS, naturally flowing streams and riparian areas help maintain water quality and improve degraded water by removing, transforming and retaining nutrients, sediments and other natural and human-made pollutants, and riparian areas are important for groundwater recharge and the reduction of streambank erosion during flooding; and

WHEREAS, desert streams, such as the Gila, Salt, and Santa Cruz Rivers that once flowed year round, now flow intermittently or not at all; and

WHEREAS, five of the 32 native fish species found in Arizona at the turn of the century no longer occur here and 21 of the remaining 27 are either listed by the State as endangered, threatened, or are under study for listing; and

WHEREAS, it is estimated that 75% or more of Arizona's wildlife is dependent upon riparian areas for some portion of its life cycle, and healthy riparian habitats are critical for the survival of the majority of Arizona's fish and wildlife species; and

WHEREAS, riparian areas are not closed ecosystems, but are dynamically interrelated with the entire surrounding watershed, and being typically associated with high water tables, they are particularly rare in the arid Southwest; and

WHEREAS, it is estimated that over 90% of the native riparian areas along our major desert watercourses has been lost, altered, or degraded; and it is recognized that past changes in these areas, particularly the alteration and loss of the State's surface water flows, have been detrimental to Arizona's riparian areas; and

WHEREAS, these dramatic changes in our riparian areas continue today as rapid population growth brings ever-increasing pressures and demands on the State's riparian resources; and it is essential to achieve and maintain a balance among the competing uses of the State's riparian resources to ensure that these areas are protected and enhanced for the benefit of present and future generations; and

WHEREAS, a growing recognition of the value and importance of Arizona's diverse riparian areas, and cooperative efforts among groups and individuals to restore, protect and manage these resources have increased significantly; and

WHEREAS, it is in the public interest to protect the functions and values of riparian areas;

NOW, THEREFORE, I, Rose Mofford, Governor of the State of Arizona, by virtue of the power vested in me, do hereby order that all applicable state agencies cooperate and seek funding to carry out the provisions below and that

1) In recognition of the critical nature of riparian areas to the State, it is hereby determined that the policy of the State of Arizona shall be:

   (a) To recognize that the protection and restoration of riparian areas are of critical importance to the State;

   (b) To actively encourage and develop management practices that will result in maintenance of existing riparian areas and restoration of degraded riparian areas;

   (c) To promote public awareness through the development of educational programs of the benefits and values of riparian areas and the need for their protection and careful management;

   (d) To seek and support cooperative efforts and local group and citizen involvement in the protection, maintenance and restoration of riparian areas;

(e) To actively encourage the preservation, maintenance and restoration of instream flows throughout the State;

(f) That any loss or degradation of riparian areas will be balanced by restoration or enhancement of other riparian areas of equal values and functions.

2) All state agencies shall rigorously enforce their existing authorities to assure riparian protection, maintenance and restoration.

3) The Commission on the Arizona Environment shall coordinate with the Department of Environmental Quality, Department of Water Resources, Department of Agriculture, Game and Fish Department, State Land Department, and State Parks Board to develop legislation to create an Arizona Watershed and Riparian Enhancement Board that would be the focal point for riparian area awareness and demonstration programs. The Board would be non-regulatory and would oversee a cost sharing or grants program to Arizonans for funding demonstration projects to accomplish on-the-ground improvement, restoration and enhancement projects.

4) There is hereby established an interagency Riparian Areas Coordinating Council, which shall consist of the directors or designees of the Commission on the Arizona Environment, Department of Environmental Quality, Game and Fish Department, State Parks Board, Department of Water Resources, State Geological Survey, Office of Tourism, State Land Department, Department of Transportation, Department of Agriculture, and Department of Commerce. This Council replaces the existing Riparian Habitat Task Force.

(a) The chair of the Council will rotate between agencies each year beginning with the representative of the Commission on the Arizona Environment and continuing through the agencies listed above. Staff support will be provided by the chairing agency as needed.

(b) The Council shall develop time frames to implement the orders outlined in this Executive Order.

(c) The Council shall submit reports at least annually to the Governor on actions taken under this Executive Order and may report on compliance of agencies with this Executive Order.

(d) The Council shall consider and recommend to the Governor a statewide riparian management plan.

(e) In discharging its responsibilities, the Council may request assistance from any agency of this State as necessary to implement the directives of this Executive Order.

(f) The Council shall develop recommendations for future actions and legislation as needed.

5) The Game and Fish Commission shall coordinate the drafting of a statewide riparian management plan for submittal to the Riparian Areas Coordinating Council.

6) The Department of Environmental Quality shall coordinate with other state agencies to develop legislation mandating state riparian area protection for submittal to the Riparian Areas Coordinating Council.

7) The Department of Water Resources shall complete the development of rules to allow for the filing and processing of instream flow water rights applications; coordinate with other state agencies to develop legislation to protect instream flows, to the extent necessary, for submittal to the Riparian Areas Coordinating Council; and develop or modify rules to facilitate the protection of riparian water usage.

8) The Game and Fish Commission shall conduct a statewide inventory and classification of riparian areas. All appropriate state agencies are directed to cooperate in this task.

9) The Game and Fish Commission shall develop methodologies for determination of equal functions and values of riparian areas for submittal to the Riparian Areas Coordinating Council.

10) The Game and Fish Commission and the State Parks Board shall acquire and manage key riparian areas and their associated water rights, and shall seek funding for such acquisition and maintenance.

11) All appropriate state agencies are encouraged to explore public/private partnerships to acquire, protect and enhance riparian areas.

12) All appropriate state agencies, in accordance with their missions, are directed to provide technical assistance to landowners who desire to acquire, protect and enhance riparian areas.

13) The State Parks Board will continue its planning efforts of multi-objective river corridor planning. All appropriate state agencies are directed to cooperate in this task, as this program has far-reaching benefits to the State of Arizona.

14) The Department of Environmental Quality shall consider the protection of riparian areas in its decision making regarding certification, conditioning, or denial of water quality certifications under Section 401 of the Federal Clean Water Act, other applicable rules, and approved state and regional water quality planning and management programs.

15) All appropriate agencies shall advocate and participate in riparian education and outreach activities through the Environmental Education Act and other ongoing processes, and shall inform public and private interests regarding the provisions of this Order.

16) All appropriate state agencies are directed to assist in the identification and evaluation of rivers and streams that might be designated as National Wild and Scenic Rivers.

17) All local governments in this State are requested and encouraged to make all of their actions consistent with the intent and goals of this Executive Order. The Department of Water Resources will serve as coordinator to develop a model local government riparian protection and maintenance ordinance, in consultation with local governments and state agencies.

IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed the Great Seal of the State of Arizona.

GOVERNOR

DONE at the Capitol in Phoenix this fourteenth day of February in the Year of Our Lord One Thousand Nine Hundred and Ninety-One and of the Independence of the United States of America the Two Hundred and Fifteenth

ATTEST:

Secretary of State

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Fife Symington, Governor Edward Z. Fox, Director

January 11, 1993

Colonel R. L. VanAntwerp
District Engineer
U.S. Army Corps of Engineers
Los Angeles District
Attn: Ms. Laura Tschudi, Chief
Environmental Design Section
300 North Los Angeles Street
Los Angeles, California 90012-2325

Dear Colonel VanAntwerp:

The following are comments that the Office of Air Quality (OAQ) of the Arizona Department of Environmental Quality (ADEQ) has on the Draft Environmental Assessment for Joint Task Force Six Operation Douglas, Cochise County, Arizona. This document was prepared by your agency in December 1992 and submitted to the OAQ for comment in the same month.

The proposed project is located in two air quality nonattainment areas for particulates (dust): these are the Douglas and Paul Spur PM_{10} Nonattainment Areas (see Enclosure 1). A nonattainment area is an area which currently does not meet federal health standards for air pollution levels.

Given the fact that our State rules regarding fugitive dust emissions are being revised, we are unable to enclose copies at this time.

Nevertheless, we are requesting that you take precautions to minimize the amount of particulates generated, including incidental emissions caused by strong winds, as well as tracking of dirt off the project site by vehicles and machinery. We recommend that you take certain preventive and mitigative steps to minimize any potential particulate pollution problem throughout the various stages of the project.

While preparing the site:

1) minimize land disturbance;
2) use water trucks to minimize dust;
3) cover trucks when hauling dirt;
4) use windbreaks to prevent accidental dust pollution and
5) limit vehicular paths and stabilize temporary roads.

January 11, 1992
Colonel R. L. VanAntwerp
Pagw Two

While completing the project:

1) cover trucks when hauling dirt;
2) water or use dust palliatives on traveled unpaved roads;
3) minimize unnecessary vehicular and machinery activities and
4) minimize dirt track-out by washing or cleaning trucks before leaving the project site.

Upon terminating the project:

1) revegetate any disturbed land not used;
2) remove unused material;
3) remove dirt piles and
4) revegetate all vehicular paths created while completing the project to avoid future off-road vehicular activities.

If these steps are taken, we feel that no significant adverse air quality impact will result from your project.

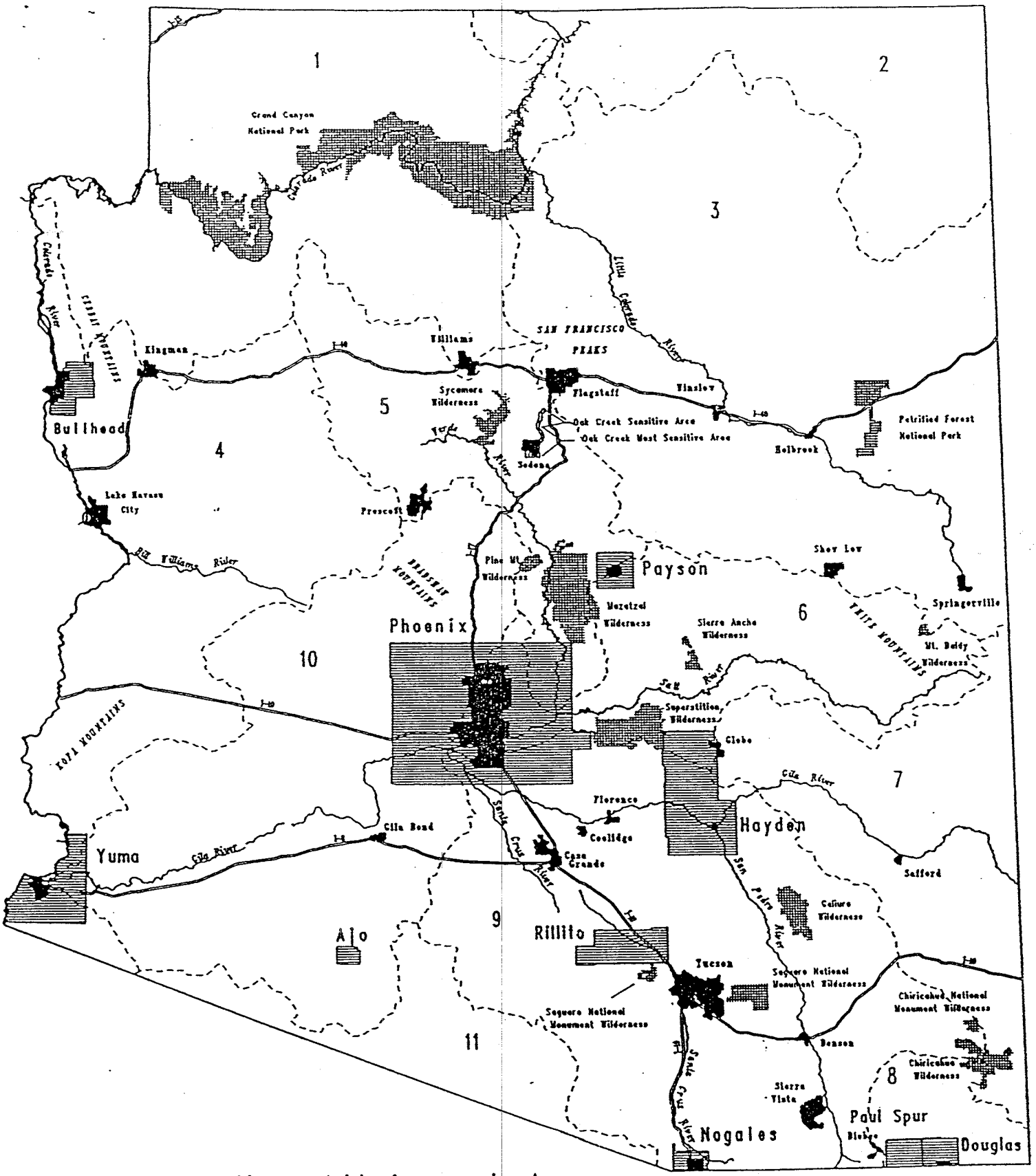
Thank you for the opportunity to comment. Should you have any further questions, please contact me at (602) 207-2377.

Sincerely,

Andra L. Juniel

Andra L. Juniel
Planner II
Air Quality Planning Section

ENCLOSURE



Arizona PM_{10} Non-Attainment Areas

Produced by Advanced Resource Technology Program
University of Arizona
Commissioned by Arizona Department
of Environmental Quality

This map is not an official designation of nonattainment areas, and the Department

KEITH KELLY
Director

DAN F. RICE
Associate Director

Arizona Department of Agriculture

1688 West Adams, Phoenix, Arizona 85007
(602) 542-4373 FAX (602) 542-0909
PLANT SERVICES DIVISION

January 22, 1993

Ms. Laura Tschudi
Chief, Environmental Design Section
P.O. Box 2711, Room 6650
Los Angeles, CA 90053

Re: Draft EA: Border road maintenance and repair; SASABE, Pima County, NACO, and DOUGLAS, Cochise County, Arizona.

Dear Ms. Tschudi:

The Arizona Department of Agriculture has reviewed the three referenced drafts dated December 1992.

We would appreciate that all protected plant species be considered prior to project development, future road repair and maintenance. The Department will be willing to participate or coordinate any plant salvage efforts. Please keep in mind that for individuals to remove protected native plant from the project area, an application for plant removal and transportation permit must be completed and signed by the land manager or agent.

Thank you for the opportunity to provide this information. If you need additional information, please contact me at (602) 542-3292.

Sincerely,

Jim McGinnis
Native Plant Law

JM:da

THE STATE OF ARIZONA

GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000

555 N. Greasewood Rd., Tucson, AZ 85745 (602) 628-5376

January 11, 1993

Colonel R.L. Van Antwerp
Department of The Army
Los Angeles District
Corps of Engineers
P.O. Box 2711
Los Angeles, CA 90053-2325

Dear Colonel Van Antwerp:

RE: Draft Environmental Assessment for Joint Task Force Six Operation - Douglas, Cochise County, Arizona.

The Arizona Game and Fish Department has reviewed the above-referenced Enivronmental Assessment (EA) dated December, 1992.

On November 30, 1992 we met with representatives of the Army Corps to review and inspect the project site. Among our concerns expressed at the time was the need for a qualified biologist to be present during the project in order to insure that environmental commitments are complied with. We note this has been incorporated into the EA (section 8.10). Provided this and other environmental commitments are implemented as described, we would agree with the finding of no significant impact that the project will not result in significant impacts to biotic resources.

Sincerely,

Richard A. Gerhart
Habitat Program Manager
Tucson Regional Office

RAG:cs

cc: Dave Walker, Habitat Coordinator
Sam Spiller, U.S. Fish and Wildlife Service

Ken Hassell Fax
Gene Sagle
213-894-5312

Arizona
State Land Department
1616 WEST ADAMS
PHOENIX, ARIZONA 85007

FIFE SYMINGTON
GOVERNOR

M.J. HASSELL
STATE LAND COMMISSIONER

MEMORANDUM

TO: BILL FISH, MANAGER
RIGHTS-OF-WAY SECTION

DATE: December 31, 1992

THRU: WILLIAM DOWDLE, MANAGER
ENVIRONMENTAL RESOURCES AND TRESPASS SECTION

FROM: STEVEN C. HILDRETH, ENVIRONMENTAL RESOURCE MANAGER
ENVIRONMENTAL RESOURCES AND TRESPASS SECTION

RE: DRAFT ENVIRONMENTAL ASSESSMENT

T240S R260E S14 - 01 et al.
DOUGLAS DRAG ROAD MAINTENANCE
DOUGLAS DRAG ROAD
DOUGLAS, AZ 85607

A letter dated 12/21/92 was received from the U.S. Army Corps of Engineers (USA COE) requesting ASLD comments regarding an attached "Draft Environmental Assessment" associated with a proposed Douglas Drag Road Maintenance Project.

Current land use of State Trust lands located within the proposed project indicates that twelve Sections are leased for grazing (05-000242, 05-000552, 05-000671, 05-002596).

The ERTS recommends that the USA COE submit to the ASLD a list of all Federal, State and/or local environmental permits (with permit number) required for the project. The ERTS requests a copy of the list.

In addition, the USA COE should be required to notify the ERTS within 24 hours (emergency situation) or within 30 days (non-emergency situation) of any environmental noncompliance or cultural resource discovery.

Attachment

4 February 1993

William Dowdle, Manager,
Environmental Resources and Trespass Section
Arizona State Land Department
1616 West Adams
Phoenix AZ 85007

RE: Response to DEA, Douglas, AZ.

Thank you for the faxed copy of your memorandum dated 31 December 1992, regarding your comments on the Draft Environmental Assessment for the Joint Task Force Six project at Douglas, Arizona.

Your comments are presented and addressed in the Final Environmental Assessment. The first of the two comments requested that "the USA COE submit to the ASLD a list of all Federal, State and/or local environmental permits (with permit numbers) required for the project. The ERTS also requests a copy of the list.". The requested list is provided on the following page. Copies are enclosed for Bill Fish and Steve Hildreth at ERTS.

The second comment regarded notification of ERTS in emergency and non-emergency resource status situations. This comment has been added to the Environmental Commitments for the project. Your office will receive a copy of the Final Environmental Assessment.

Thank your for your comments on the JTF - 6 project at Douglas, Arizona.

Gene Seagle
Corps of Engineers

Attachment
cc: ASLD - Hildreth, Fish

Joint Task Force Six
Douglas, Arizona Road Maintenance Project
February 1993

List of Applicable Environmental Laws and Permits

The environmental coordination performed for this project is listed in the Final Environmental Assessment. Many agencies and individuals were contacted regarding permit applicability. Those most germane to the project are summarized below. At this time, there are no numbered permits applicable to this project.

Section 404(b)(1) - Water Quality Evaluation (Clean Water Act)

The terms and limitations of the Act will be followed. According to Robert Dummer, Corps of Engineers Regulatory Office, Phoenix, Arizona, this project qualifies under Nationwide Permit, Section #14, "road crossings". Mr. Dummer gave specific direction to limit construction activity at Whitewater Draw to the existing roadbed. This statement was added to the Environmental Commitments for the project. He will provide a letter to the Los Angeles District to this effect.

Section 402 - (NPDES) of Clean Water Act.

JTF-6 coordinated with Arizona Department of Environmental Quality and concluded that the vendors (from Fort Huachuca Vendor contracting office) used for this project obtain their fill materials from quarries, and waste will not be discharged into rivers or streams. Therefore, this permit is responsibility of supplier (quarry) to vendor.

U.S. Bureau of Land Management - Construction Right of Way.

JTF - 6 has developed a Memorandum of Agreement regarding this project and has forwarded this Agreement to the BLM Safford Office for their signature. A copy of the MOA will be available at JTF - 6 and COE Los Angeles District. The Construction Right of Way permit is not ready at this time, but will soon be on file at BLM.

State of Arizona, Section 401 - WQMS-301.030 - Applicants Response to Arizona Water Quality Control Council Policy for Construction and Related Activities in Water, Adopted April 13, 1977, Revised January 3, 1990.

Mr. James Matt stated that when a project is qualified for Nationwide Permit, #14 "Road Crossing" (see above), the project is "precertified" for 401 State Water Quality Certification. This case applies to the Douglas project. Therefore no 401 permit is required. Mr. Matt will provide a letter to the Los Angeles District to this effect.

Arizona State Land Department - Construction Right of Way.

This permit is not ready at this time, but will soon be on file at ASLD.

ARIZONA STATE PARKS

800 W. WASHINGTON
SUITE 415
PHOENIX, ARIZONA 85007
TELEPHONE 602-542-4174

January 20, 1993

Robert S. Joe
Chief, Planning Division
U.S. Army Corps of Engineers
Los Angeles District
Attn: Ms. Laura Tschudi (CESPL-PD-RL)
Chief, Environmental Design Section
P.O. Box 2711, Room 6650
Los Angeles, CA 90053-2325

RE: Joint Task Force Six, Douglas Drag Road Maintenance Project, DOD

Dear Mr. Joe:

Thank for for sending us a copy of the draft Environmental Assessment (EA) for the above project. I have reviewed this document and have the following comments pursuant to 36 CFR Part 800:

In my opinion, the draft EA adequately considers potential impacts to cultural resources and includes provisions for consultations with this office. Thus, we accept the EA as written and also concur with the agency's Finding of No Significant Impact (FONSI).

For your information, I have already consulted with your office regarding the effect of this project on historic properties. During those consultations the agency and this office concurred on a determination of no effect based on the protective measures initiated by the agency and complete avoidance of the National Register eligible sites.

We appreciate your continued cooperation with this office in complying with the historic preservation requirements for Federal undertakings. If you have any questions, please contact me at 542-4174 or 542-4009.

Sincerely,

Robert E. Gasser
Compliance Coordinator
State Historic Preservation Office

COCHISE COUNTY DEPARTMENT OF PUBLIC WORKS

619 Melody Lane, BISBEE, ARIZONA 85603-3090
Phone: (602) 432-9420 — FAX: (602) 432-9432

January 20, 1993

Mr. Gene Seagle
Environmental Coordinator
Environmental Design Section
Department of the Army
Los Angeles District, Corps of Engineers
P.O. Box 2711
Los Angeles, CA 90053-2325

Dear Mr. Seagle:

Cochise County Planning and Zoning has forwarded information to this office regarding proposed improvements to 24 miles of drag road along the international border in Cochise County. Be advised that a Right-of-Way Use Permit will be required if the proposed work will significantly impact any existing County roads or rights-of-way.

I am forwarding a Right-of-Way Use Permit Application. Please fill it out and provide information which will allow this office to determine whether a permit will be required.

Sincerely,

Jeff Schwarz

Jeff Schwarz
Inspector

hm

enclosure

JS\SEAGLE

PZ 1.3

COCHISE COUNTY PLANNING DEPARTMENT
BUILDING & ZONING DIVISION

1939 C SOUTH FRONTAGE RD.
SIERRA VISTA, AZ 85635

(602) 452-4920
FAX (602) 452-4927

January 14, 1993

Mr. Gene Seagle
Environmental Coordinator
Environmental Design Section
Department of the Army
Los Angeles District, Corps of Engineers
P. O. Box 2711
Los Angeles, California 90053-2325

Re: Cochise County Planning Department's comments on Douglas Drag Road Maintenance Project

Dear Mr. Seagle:

Pursuant to our recent conversation today, I am sending you this letter. As I mentioned, the Planning Department has no zoning concerns with the above referenced proposal at this time. This Department would, however, request that the Border Patrol Facility in Douglas apply for an informational permit to establish the proposed fencing around their station. Since the Planning Department essentially has no jurisdictional authority over this federal operation, the permit application is simply a formality for record keeping purposes and no fees will be required.

Specifically, I would ask that the Border Patrol Facility complete the Joint Use Permit Application enclosed and submit this and the same site plan as enclosed within the request for comments to the following address:

Cochise County Planning Department
619 Melody Lane
Bisbee, Arizona 85603
(Attention: David Petersen)

Upon receipt of these items, an informational permit will be issued by the Planning Department.

Also as I mentioned, I have forwarded the request for comments to both the Public Works Department and Flood Control Office for review. Should they have any concerns, they will contact your office directly.

APPENDIX D

NOTICE OF AVAILABILITY

Prepared By:

United States Army Corps of Engineers

Los Angeles District

Los Angeles, California

1993

ENVIRONMENTAL ASSESSMENT AVAILABLE FOR PUBLIC COMMENT

The United States Army's Joint Task Force Six Operation has proposed to:

maintain/repair approximately 24 miles of road along the United States - Mexico border, east and west of Douglas, Arizona;

maintain/repair approximately 1 mile of mountain road along the United States - Mexico border, east of Douglas, Arizona; and

install fences at the U.S. Border Patrol Station at Douglas, Arizona.

The purpose of the project is to support the U.S. Border Patrol in the surveillance and apprehension of illegal (drug smuggling) activities crossing the border into the United States. The Environmental Assessment for this project is available for public review and comment for a thirty (30) day period at the following locations:

Douglas Public Library, 625 10th Street, Douglas, Arizona 85607 (Reference Desk)

Cochise County Community College, 4190 West Highway 80, Douglas, Arizona 85607 (Reference Desk)

The public comment period ends January 21, 1993. Comments received before this date will be accepted.

Please Address and comments to:

U.S. Army, Corps of Engineers, ATTN: Ms. Laura Tschudi, Chief, Environmental Design Section, P.O. Box 2711, Los Angeles, CA 90053.